BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

| In the Matter of the Application of Troy |) | |
|---|---|-------------------------|
| Township for Certification as a Natural Gas |) | Case No. 14-0368-GA-GAG |
| Governmental Aggregator. |) | |

MOTION FOR EXTENSION OF CERTIFICATE EXPIRATION DATE

On behalf of the Troy Township, Delaware County (Troy), Trebel, LLC (Trebel) hereby files this motion for an extension of the expiration date of Certificate 14-347G issued by the Public Utilities Commission of Ohio (Commission) in Case No. 14-0368-GA-GAG, which certified Troy as an Ohio competitive retail natural gas governmental aggregator to provide governmental aggregation services effective April 4, 2022. Troy respectfully requests that the Commission extend Certificate No. 14-347G 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. 14-0368-GA-GAG.

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

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

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Troy)
Township for Certification as a Natural Gas) Case No. 14-0368-GA-GAG
Governmental Aggregator.)

MEMORANDUM IN SUPPORT

The Commission issued Certificate No. 14-347G, which certified Troy to provide competitive retail natural gas governmental aggregator services within the State of Ohio, effective April 4, 2022. By its terms, the certificate is set to expire on April 4, 2024. Due to the timing of the board of trustees 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 Troy's renewal application for certification as a natural gas governmental aggregator in Case No. 14-0368-GA-GAG.

In order to continue the effectiveness of Troy's certificate and to provide adequate time for the Commission to consider the renewal application, Troy respectfully requests an extension of its certificate. Troy'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 Troy to obtain a renewal certificate without causing undue hardship or inconvenience to Troy 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 Troy 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
easley@carpenterlipps.com
(willing to accept service by email)

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).

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

3/20/2024 1:05:04 PM

in

Case No(s). 14-0368-GA-GAG

Summary: Motion Motion for Extension of Certificate Expiration Date Troy Township - Gas (14-368-GA-GAG) electronically filed by Mrs. Kimberly W. Bojko on behalf of Trebel LLC.