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December 6, 2006

Public Utilities Commission of Ohio
Docketing Division
180 E. Broad Street, 13th Floor
Columbus, Ohio 43215-3793

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PUCO

Re: In the Matter of the Lucas County for
Certification as a Governmental
Aggregator
Case No. 00-2027-EL-GAG

Dear Clerk:

Enclosed please find one original and ten copies of the Motion for Extension of Certificate Expiration Date and Memorandum in Support for filing. Please return extra file-stamped copies the enclosed postage prepaid envelope.

Thank you for your assistance in this matter. If you have any questions, please feel free to contact me at 419.213.2001.

Sincerely,

Lance M. Keiffer BA
Lance M. Keiffer
Assistant Prosecuting Attorney

LMK/bma
Enclosure(s)

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**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

PUCO

In The Matter of the)	
Lucas County for Certification)	Case No. 00-2027-EL-GAG
As a Governmental Aggregator)	

**MOTION FOR EXTENSION OF CERTIFICATE EXPIRATION DATE AND
MEMORANDUM IN SUPPORT**

I. MOTION FOR EXTENSION

Now comes the Board of County Commissioners, Lucas County, Ohio ("Lucas County") and moves that the Public Utilities Commission of Ohio ("Commission") grant an extension of the December 24, 2006, expiration date of its certificate to provide governmental aggregation services. Inadvertently, Lucas County did not file an application for renewal of Certificate 00-028 (3) within the 30-120 day advance window set forth in rule 4901:1-27-09 of the Ohio Administrative Code ("OAC"). Lucas County will file its renewal application, out of time, on or before December 13, 2005, and Lucas County seeks an extension of its certificate's expiration date while the Commission is considering the renewal application.

II. MEMORANDUM IN SUPPORT

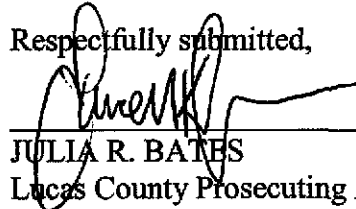
Lucas County was granted the authority to provide governmental aggregation services on December 24, 2004, and its current certificate expires on December 24, 2006. Since that time, Lucas County has chosen a supplier for the retail electric services for its residents, and power is flowing to its participants under their aggregation program. Unfortunately, due to an inadvertent

oversight with regard to the timing for filing, Lucas County did not realize that the advance filing date for its certificate renewal has passed. Lucas County will file its renewal application on or before December 13, 2006. While the Commission considers the renewal, Lucas County requests an extension of the expiration date of its certificate from December, 24, 2006 to January 13, 2007, to allow for the thirty day review period from the December 13, 2006 renewal application filing date.

Lucas County's request for an extension is reasonable under the circumstances and should be granted. Should the County's ability to provide aggregation services expire on December, 24 2006, Lucas County's aggregation participants would be at a disadvantage in that they would not be able to receive the most competitive electric rate. Although Lucas County inadvertently failed to file its renewal application within the 30-120 day window as set forth in Rule 4901:1-27-09 (A), in substance there have been no material changes in Lucas County's operation of its aggregation program. Indeed, except for the automatic expiration date of its Certificate 00-028 (3), Lucas County has done nothing that would warrant suspension or rescission of its authority. Since Lucas County's dilemma has been caused by an inadvertent oversight, an extension would allow the County to obtain renewal of its certificate without causing inconvenience to its participants. Indeed, extension of the expiration date is necessary to prevent irreparable harm to Lucas County and its residents, and would prevent disruption in service to Lucas County participants. Lucas County respectfully submits that an extension of its certificate expiration date is in the public interest.

Wherefore, Lucas County respectfully urges the Commission to grant the extension.

Respectfully submitted,



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