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2007 SEP 28 PM 3: 23

September 28, 2007 PUCO

VIA HAND DELIVERY

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

> Re: In the matter of the Application of Volunteer Energy Services, Inc. for Renewal of Certification as a Competitive Retail Electric Supplier, Case No. 03-1742-EL-AGG

Dear Sirs:

Enclosed please find an original and eleven (11) copies of the Motion for Extension of Time to be filed in the above-referenced case. Please return a time-stamped copy to us. If you have any questions, please don't hesitate to contact me.

Very truly yours,

CARLILE PATCHEN & MURPHY LLP

J¢hn L. Einstein, IV

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BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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n the matter of the Application of) .
Volunteer Energy Services, Inc. for)
Renewal of Certification as a Competitive) Case No. 03-1742-EL-AGG
Retail Electric Supplier.	Ì

MOTION FOR EXTENSION OF TIME

Pursuant to Section 4901-1-13(A) Ohio Admin. Code, Volunteer Energy Services, Inc. ("VESI") respectfully requests that the Public Utilities Commission of Ohio ("PUCO" or "Commission") grant its Motion for Extension of Time to file its application for renewal of certification as a competitive retail gas supplier for the reasons set forth in the attached Memorandum in Support. VESI seeks an extension of time to file its application for renewal certification until October 12, 2007.

Respectfully submitted,

CARLILE PATCHEN & MURPHY LLP

John L. Einstein, IV (0072069)

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ATTORNEY FOR VOLUNTEER

ENERGY SERVICES, INC.

MEMORANDUM IN SUPPORT

The reason for the delay is a combination of both (1) a failure to appreciate that the application for renewal of certification was close at hand, and (2) the desire to include the most recent information regarding the financial status of VESI and that additional information took longer than expected to acquire. VESI is in the process of moving its operations into new offices and access to the most recent data and information is not currently accessible, but will be available in time for VESI to file its renewal application by October 12, 2007.

VESI maintains that this delay has not served to prejudice any party.

WHEREFORE, VESI respectfully requests that the Commission grant its Motion for Extension of Time pursuant to Section 4901-1-13(A), Ohio Administrative Code, for the reasons set forth above.

Respectfully submitted,

CARLILE PATCHEN & MURPHY LLP

John L. Einstein, IV (0072069)

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