



# SEC

## STAND ENERGY CORPORATION

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FILE

November 24, 2008

**VIA UPS NEXT DAY AIR**

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

PUCO

2008 NOV 25 AM 10:43

RECEIVED-DOCKETING DIV

**Re: Case No. 02-2549-GA-CRS**

Ladies and Gentlemen:

Enclosed for filing is an original and ten (10) copies of Stand Energy Corporation's "Motion For Extension of Existing Competitive Retail Natural Gas Supplier Certificate or, in the alternative, for an Expedited Ruling on Stand's Renewal Application" and supporting Memorandum.

Sincerely,

John M. Dosker  
General Counsel

Enclosures

This is to certify that the images appearing are an  
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Technician S Date Processed NOV 25 2008

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of                     )  
Stand Energy Corporation for Renewal                     )  
Of Its Certification as a Competitive Retail                     )  
Natural Gas Supplier in Ohio                     )

Case No. 02-2549-GA-CRS

PUCO

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**MOTION FOR EXTENSION OF EXISTING COMPETITIVE RETAIL  
NATURAL GAS SUPPLIER CERTIFICATE OR, IN THE ALTERNATIVE,  
FOR AN EXPEDITED RULING ON STAND'S RENEWAL APPLICATION.**

\* \* \* \* \*

Pursuant to Rules 4901-1-13(A); 4901-1-12(C) and 4901:1-27-02(B) of the Ohio Administrative Code ("O.A.C."), Stand Energy Corporation ("Stand") respectfully moves the Public Utilities Commission of Ohio ("PUCO") for an extension of its current CRNGS certificate expiration date of December 6, 2008 in the above styled and captioned matter and for leave to continue operating as a competitive retail natural gas supplier pending PUCO review of Stand's 2008 application for renewal certification filed on or about November 17, 2008.

In the alternative, Stand would request an expedited ruling on its renewal application. Stand certifies that no other party has legal standing to object to the issuance of an expedited ruling (4901-1-12(C)(D)) and therefore respectfully requests issuance of an expedited ruling on its renewal application. Memorandum in support attached.

Respectfully submitted,

**STAND ENERGY CORPORATION**

BY: John M. Dosker  
John M. Dosker  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion and Memorandum was filed with the PUCO by UPS Overnight Delivery this 24<sup>th</sup> day of November, 2008.

John M. Dosker  
John M. Dosker

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Stand Energy Corporation for	)	<b>Case No. 02-2549-GA-CRS</b>
Re-Certification as a Competitive Retail	)	
Natural Gas Supplier in Ohio	)	

\* \* \* \* \*

**MEMORANDUM IN SUPPORT OF MOTION FOR EXTENSION OF EXISTING  
COMPETITIVE RETAIL NATURAL GAS SUPPLIER CERTIFICATE OR, FOR  
AN EXPEDITED RULING ON STAND'S RENEWAL APPLICATION.**

\* \* \* \* \*

**Extension of Existing CRNGS Certificate**

On December 7, 2006, Stand Energy Corporation ("Stand") was awarded a Renewal of its Competitive Retail Natural Gas Supplier Certificate [Certificate No. 02-043(3)] in the above-captioned proceeding. That certificate expires on December 7, 2008.

On November 14, 2008, Stand filed its biennial renewal application for re-certification with the Public Utilities Commission of Ohio as competitive retail natural gas supplier (CRNGS). The filing was made via UPS Delivery and was received by the PUCO on or about Monday, November 17, 2008. Stand simultaneously filed a "Motion For Protective Order and Waiver" regarding confidentiality of financial information.

At the time of filing, Stand was not aware that it was filing the application beyond the time requirements set forth in Rule 4901-1-27-06. Stand simply misinterpreted the deadline to file for renewal as being prior to the expiration of the existing certificate.

Pursuant to Rule 4901-1-13(A) the PUCO should find that Stand Energy's failure to recognize the filing deadline was the result of inadvertence and excusable neglect.

Stand's renewal application does not contain any adverse information or material changes from the last renewal application filed in 2006. Stand's failure to file within the time limits proscribed was not an attempt to hide or conceal negative information from the PUCO, because there is no adverse information to disclose. In fact, Stand is in better financial condition currently, than when any of the previous applications was approved. Except for matters relating to the automatic expiration of a CRNGS Certificate, Stand has not done anything, in any state, that would warrant suspension or revocation of its CRNGS operating authority in Ohio.

If Stand's Ohio certification was revoked or suspended, it would initiate a domino effect of cross-defaults in other States where Stand is licensed or certified because those states require a sworn statement that the applicant has never had its licensed revoked, suspended, etc. in any other state. All states have requirements to immediately notify the Public Service/Utility Commission in the event of material changes. Therefore, if Stand's Ohio certification were lost, even temporarily, the affects could be devastating and cause irreparable harm to Stand and industrial, commercial and residential customers, not just in the State of Ohio, but in other states as well. An extension of the existing CRNGS Certificate is in the best interests of Stand Energy and our customers, many of whom would suffer harm if Stand's certification were revoked or suspended. Extending the existing certificate does harm to no one.

The PUCO should extend Stand's current certificate until the renewal certificate is reviewed and approved. Pursuant to Rule 4901:1-27-02(B), "Nothing contained in this Chapter shall preclude the commission from altering, amending or waiving, in whole or in part, any of these rules." The Commission should exercise its regulatory discretion and approve Stand's motion to extend the current certificate.

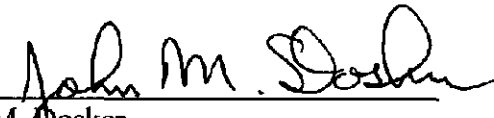
### **Motion For Expedited Ruling**

If necessary or in the alternative, Stand requests an expedited ruling on its renewal certification to bring Stand into immediate compliance with PUCO rules. There are no material changes to prior applications. There are essentially updated schedules and financial information. Otherwise, very little has changed in the 2008 application.

Because there are no other "parties" to this proceeding at this time (other than Stand and the PUCO), Stand certifies that no other party has legal standing to object to the issuance of an expedited ruling. See, 4901-1-12(C). Nor will the issuance of such an expedited ruling "adversely affect a substantial right of any party" under 4901-1-12(D). Therefore, in the alternative, Stand respectfully requests issuance of an expedited ruling on its application for renewal certification.

Respectfully submitted,

**STAND ENERGY CORPORATION**

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