

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of the Application of Liberty )  
Power Delaware LLC for Renewal of its ) **Case No. 06-1387-EL-CRS**  
Certification as a Competitive Retail Electric )  
Service Provider. )

In the Matter of the Application of Liberty )  
Power Holdings LLC for Renewal of its ) **Case No. 06-1388-EL-CRS**  
Certification as a Competitive Retail Electric )  
Service Provider. )

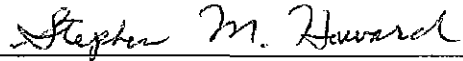
**MOTION FOR EXTENSION OF TIME  
AND REQUEST FOR EXPEDITED RULING**

Now come Liberty Power Delaware LLC ("LPD") and Liberty Power Holdings LLC ("LPH"), who jointly move the Public Utilities Commission of Ohio or its Attorney Examiner to extend the expiration date of Certificate Nos. 07-136(1) and 07-137(1) which authorizes each holder to provide competitive retail power marketer services in the State of Ohio. The certificates are due to expire on February 7, 2009, and LPD and LPH seek to extend the expiration dates until February 13, 2009 to allow for the 30-day review process of their Renewal Applications, which were filed on January 14, 2009.

Liberty Power Delaware LLC and Liberty Power Holdings LLC also request that the Commission issue an expedited ruling on their requests pursuant to Rule 4901:1-12(C) and (F), Ohio Administrative Code. LPD and LPH request these extensions and expedited rulings for the reasons set forth in the attached Memorandum in Support.

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Respectfully submitted,



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<b>Service Provider.</b>	)	

**MEMORANDUM IN SUPPORT OF ITS MOTION FOR EXTENSION  
OF TIME AND REQUEST FOR EXPEDITED RULING**

Liberty Power Delaware LLC ("LPD") and Liberty Power Holdings LLC ("LPH") were issued Renewal Certificate Nos. 07-136(1) and 07-137(1) respectively to provide competitive retail electric service for the two-year period commencing February 16, 2007 and ending February 7, 2009. Unfortunately, due to the pendency of an urgent business matter and limited staff resources, LPD and LPH were unable to file their Renewal Applications until January 14, 2009, six days after the January 8, 2009 deadline. As is demonstrated in the Renewal Applications, there have been no material changes in either LPD's or LPH's business practices as defined by Rule 4901:1-24-10 of the Ohio Administrative Code ("OAC").

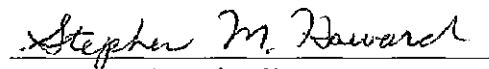
LPD and LPH respectfully request that the Commission extend Certificate Nos. 07-136(1) and 07-137(1) for six days to February 13, 2009 so that there will be no interruption. LPD and LPH apologize for this delay and assure the Commission that consistent with LPD and LPH's past practices, all reports and certifications required by the Commission will be timely filed in the future.

LPD and LPH also request that an expedited ruling be issued on this motion pursuant to Rule 4901:1-12(C) and (F) of the OAC, considering that their current certificates are due to

expire February 7, 2009. Because LPD and LPH are the only parties to these proceedings, an expedited ruling will not adversely affect the substantive right of any party.

The Commission has the plenary authority to extend the expiration date of LPD's and LPH's certificates for good cause shown. Good cause exists for granting the requested brief extensions. Consequently, Liberty Power Delaware LLC and Liberty Power Holdings LLC respectfully request a brief extension of the expiration date of their certificates.

Respectfully submitted,



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