

FILE

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Commerce )  
Energy, Inc. for a Renewal of Certification as a ) Case No. 02-1828-GA-CRS  
Competitive Retail Natural Gas Supplier. )

**MOTION FOR EXTENSION OF CERTIFICATE EXPIRATION DATE**  
**AND REQUEST FOR EXPEDITED RULING**

Pursuant to Rule 4901-1-12(C) of the Ohio Administrative Code, Commerce Energy, Inc. d/b/a Just Energy ("Just Energy") files this motion seeking to extend the expiration date of its current Certificate No. 02-023 until such time as the Commission rules upon the renewal application in this case. Certificate No. 02-023 is due to expire on September 17, 2010. Just Energy asks for an expedited ruling to avoid the prospect of customers being without gas service during the Commission's consideration of Just Energy's application for renewal of its certificate. There are no intervenors in this case. The Staff has no objection to the requested extension. The reasons supporting such a motion are set forth in the accompanying memorandum in support. Good cause exists for granting the motion for an extension on an expedited basis.

WHEREFORE, Commerce Energy, Inc. d/b/a Just Energy respectfully requests that the Commission grant this motion and extend the expiration date of Certificate No. 02-023 until such time as the Commission rules upon the renewal application in this case.

Respectfully submitted,



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## **MEMORANDUM IN SUPPORT**

On August 12, 2010, Just Energy timely filed an application for renewal of Certificate No. 02-023 which authorizes it to provide competitive retail natural gas services. Certificate No. 02-023 expires on September 17, 2010.

On September 10, 2010, the Attorney Examiner issued an Entry suspending the 30 day automatic approval process for Just Energy's application to renew its Certificate.

Without an extension of time, Just Energy will not be able to serve customers beyond September 17, 2010. Further, Just Energy with just a few business days of notice would have to idle its marketing work force consisting of over 200 employees living in Ohio and 50 employees in Ohio and elsewhere whose job is directly tied to supporting the Ohio marketing effort. An extension will allow Just Energy to continue to provide competitive retail natural gas service to customers and not lay off any of its 200 Ohio marketing employees.

The only parties to this proceeding are Just Energy and the Staff, and the Staff has indicated that it does not oppose this request for such an extension.

Good cause exists for extending the expiration date of Certificate No. 02-023 until such time as the Commission rules on the renewal application.

WHEREFORE, Commerce Energy, Inc. d/b/a Just Energy respectfully requests that the attorney examiner grant on an expedited basis this motion and extend the expiration date of Certificate No. 02-023 until such time as the Commission rules on the renewal application.

Respectfully submitted,



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