	BEFORE TES COMMISSION OF OHIO	ES BIOZ	RECEIVE
In the Matter of the Application of Energy Cooperative of Ohio to Renew Certification as a Retail Natural Gas Supplier.	) Case No. 02-1891-GA-CRS	20 PM 5: 24	ED-DOCKETING DIV

#### MOTION TO EXTEND THE EFFECTIVE DATE OF ENERGY COOPERATIVE OF OHIO'S CURRENT OHIO COMPETITIVE RETAIL NATURAL GAS MARKETER CERTIFICATE AND MEMORANDUM IN SUPPORT

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**September 20, 2010** 

**Attorneys for Energy Cooperative of Ohio** 

{C32020.}

### BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of	)	
Energy Cooperative of Ohio to Renew	)	
Certification as a Retail Natural Gas	)	Case No. 02-1891-GA-CRS
Supplier.	j	

# MOTION TO EXTEND ENERGY COOPERATIVE OF OHIO'S OHIO COMPETITIVE RETAIL NATURAL GAS MARKETER CERTIFICATE

Energy Cooperative of Ohio ("ECO") respectfully requests that the Public Utilities Commission of Ohio extend the expiration date of ECO's Certificate No. 02-038(4), which authorizes ECO to provide competitive retail natural gas marketer services in the State of Ohio. ECO's current certificate is due to expire on September 26, 2010. ECO filed a renewal certification application on September 16, 2010. In order to allow for the 30-day review process of its renewal application without allowing ECO's certification to expire, ECO respectfully seeks to extend the expiration date until October 16, 2010.

WHEREFORE, ECO respectfully requests that the Commission grant its motion to extend the expiration date of Certificate No. 02-038(4) from September 26, 2010 to October 16, 2010.

Respectfully submitted:

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# BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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Certification as a Retail Natural Gas	)	Case No. 02-1891-GA-CRS
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#### **MEMORANDUM IN SUPPORT**

ECO has been an Ohio certified competitive retail natural gas marketer since 2002. ECO was issued Certificate No. 02-038(4) to provide competitive retail natural gas marketer services for the two year period commencing September 26, 2008 and ending September 26, 2010. Unfortunately, due to an administrative error, ECO filed its renewal application on September 16, 2010, which is outside of the time frame set forth by Rule 4901:1-27-09, Ohio Administrative Code ("OAC").

The Commission has plenary authority to extend the expiration date of ECO's certification for good cause shown. ECO's tardiness in filing its renewal application was solely due to an inadvertent administrative error. ECO takes its responsibilities, including timely filing applications for renewal on a timely basis, seriously. ECO apologizes for its administrative error and pledges that all filings going forward will be timely and properly made in compliance with the governing rules in the future.

Additionally, now that the Commission has received a filed copy of ECO's renewal application, the Commission can see that there have been no material changes in ECO's business practices as defined by Rule 4901:1-27-10, OAC. Nonetheless, ECO recognizes that the Commission Staff still needs adequate time to review ECO's renewal application.

For the reasons stated herein, ECO respectfully requests a brief extension of the expiration date of its certification.

Respectfully submitted,

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