

FILE

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

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In The Matter of the)
Medina County for Certification) Case No. 10-0923-EL-GAG
As a Governmental Aggregator)

MOTION FOR EXTENSION OF CERTIFICATE EXPIRATION DATE AND
MEMORANDUM IN SUPPORT

I. MOTION FOR EXTENSION

Now comes the County of Medina and moves that the Public Utilities Commission of Ohio ("Commission") grant an extension of the August 2, 2012, expiration date of its certificate to provide governmental aggregation services. Inadvertently, Medina did not file an application for renewal of Certificate 10-283E (1) within the 30-120 day advance window set forth in rule 4901:1-27-09 of the Ohio Administrative Code ("OAC"). Medina filed its renewal application, out of time, on July , 2012, and Medina seeks an extension of its certificate's expiration date while the Commission is considering the renewal application.

II. MEMORANDUM IN SUPPORT

County of Medina was granted the authority to provide governmental aggregation services on August 2, 2010, and its current certificate expires on August 2, 2012. Since that time, Medina has chosen a supplier for the retail electric services for its residents, and power is flowing to its residents under their aggregation program. Unfortunately, due to an inadvertent oversight with regard to the timing for filing, Medina did not realize that the advance filing date for its certificate renewal has passed. Medina filed its renewal application on July , 2012. While the Commission considers the renewal, Medina requests an extension of the expiration date of its

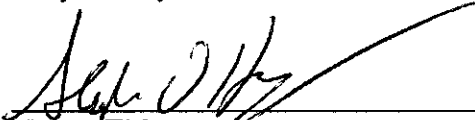
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certificate from August 2, 2012 to August 17, 2012, to allow for the thirty day review period from the July , 2012 renewal application filing date.

Medina's request for an extension is reasonable under the circumstances and should be granted. Should the County's ability to provide aggregation services expire on August 2, 2012, Medina's residents would be at a disadvantage in that they would not be able to receive the most competitive electric rate. Although Medina inadvertently failed to file its renewal application within the 30-120 day window as set forth in Rule 4901:1-27-09 (A), in substance there have been no material changes in Medina's operation of its aggregation program. Indeed, expect for the automatic expiration date of its Certificate 10-283E(1), Medina has done nothing that would warrant suspension or rescission of its authority. Since Medina's dilemma has been caused by an inadvertent oversight, an extension would allow the County to obtain renewal of its certificate without causing inconvenience to its residents. Indeed, extension of the expiration date is necessary to prevent irreparable harm to Medina and its residents, and would prevent disruption in service to Medina residents. The County of Medina respectfully submits that an extension of its certificate expiration date is in the public interest.

Wherefore, Medina respectfully urges the Commission to grant the extension.

Respectfully submitted,


Name, Title STEPHEN D. HANDLEY, PRESIDENT
Medina County Board of Commissioners