

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

<b>In the Matter of the Application of</b>	)	
<b>Liberty Power Delaware, LLC for</b>	)	
<b>Renewal of its Certification as a</b>	)	<b>Case No. 06-1387-EL-CRS</b>
<b>Retail Generation Provider and Power</b>	)	
<b>Marketer in the State of Ohio.</b>	)	

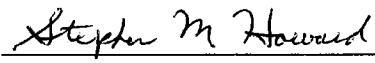
<b>In the Matter of the Application of</b>	)	
<b>Liberty Power Holdings, LLC for</b>	)	
<b>Renewal of its Certification as a</b>	)	<b>Case No. 06-1388-EL-CRS</b>
<b>Retail Generation Provider and Power</b>	)	
<b>Marketer in the State of Ohio.</b>	)	

**MOTION FOR EXTENSION OF TIME**

Now comes Liberty Power Delaware, LLC and Liberty Power Holdings, LLC (collectively, as "Liberty Power"), and move the Public Utilities Commission of Ohio or its Attorney Examiner to extend the expiration date of Liberty Power's Certificate Nos. 07-136E (3) and 07-137E (3), which authorizes both to provide competitive retail generation and power marketer services in the State of Ohio. The certificates will expire on February 13, 2013, and Liberty Power seeks to extend the expiration date of both certificates until February 24, 2013 to allow for the 30-day review process of renewal applications, which are expected to be filed on January 25, 2013.

Liberty Power requests this extension be granted for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,



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Liberty Power Holdings, LLC

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**MEMORANDUM IN SUPPORT**

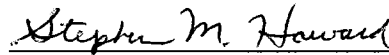
Liberty Power was issued Certificate Nos. 07-136E (3) and 07-137E (3) to provide competitive retail generation and power marketer services for the two-year period commencing February 16, 2011 and ending February 13, 2013. Unfortunately, due to a change in personnel and an administrative oversight, Liberty Power did not timely file renewal applications in these cases.

After having been contacted by the Commission Staff, Liberty Power is preparing and is expecting to file renewal applications on January 25, 2013. Liberty Power respectfully requests that the Commission extend Certificate Nos. 07-136E (3) and 07-137E (3) by eleven days to February 24, 2013 so that there will be no interruption in Liberty Power's authorizations to provide retail generation and power marketer services in Ohio. Although supplemental information was filed in 2012 in Case No. 06-1388, Liberty Power did not meet the January 14, 2013 submission date for filing renewal applications. Liberty Power apologizes for this administrative oversight and ensures the Commission that all reports and certifications required by the Commission will be timely filed in the future. Furthermore, Liberty Power emphasizes its

desire to continue to serve customers in Ohio and hopes the Commission will take into account this commitment when making its decision on their Motion for Extension of Time.

The Commission has plenary authority to extend the expiration date of Liberty Power's certificates for good cause shown. As demonstrated above, good cause exists as Liberty Power's tardiness in filing their Renewal Applications was solely due to a change in personnel and an administrative oversight. Consequently, Liberty Power respectfully requests an extension of the expiration date of Certificate Nos. 07-136E (3) and 07-137E (3) so that it can maintain its authorization to provide retail generation and power marketer services in Ohio.

Respectfully submitted,



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**Case No(s). 06-1387-EL-CRS, 06-1388-EL-CRS**

Summary: Motion Motion for Extension of Time electronically filed by Mr. Stephen M Howard on behalf of Liberty Power Holdings, LLC and Liberty Power Delaware, LLC