

In the Matter of the Application of )  
Aspen Energy Corporation, for a ) Case No. 13-2342-GA-AGG  
Time Extension for Renewal Application )

Aspen Energy Corporation (“Aspen”) moves the Public Utilities Commission of Ohio (“PUCO” or “Commission”) for an expedited ruling to extend the time for filing the renewal application for the natural gas aggregator/brokerage services it provides.<sup>1</sup> Specifically, Movant requests that the due date for the renewal application be extended to January 17, 2014. Additionally, Aspen requests that the Commission also grants an allowance to Aspen uninterrupted service until it completes the aforementioned renewal application.

For Aspen Energy Corporation

s/ Jill S. Kirila

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<sup>1</sup> Ohio Adm. Code 4901-1-13(A) and 4901-1-12(C).

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Aspen Energy Corporation, for an	)	Case No. 13-2342-GA-AGG
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**MEMORANDUM IN SUPPORT**

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**I. Introduction**

On October 17, 2013, Aspen Energy Corporation's ("Aspen" or "Movant") certificate for its gas services expired. That certification number is 09-161G(2). Aspen plans to complete a renewal certificate pursuant to Ohio Administrative Code section 4901:1-27-09 Certification Renewal for its Brokerage and Aggregator services.

Aspen requests that the Public Utilities Commission of Ohio ("PUCO" or "Commission") grants additional time to complete the section 4901:1-27-09 renewal application. Specifically, Aspen requests a new deadline of January 17, 2014. While this renewal is pending, Aspen also requests that the Commission grants an allowance to Aspen for providing uninterrupted service to its customers.

Aspen does not anticipate any objections to the aforementioned request and therefore requests an expedited ruling on this motion pursuant to Ohio Administrative Code 4901-1-12(C). Aspen asks the Commission to grant these two requests in accordance with the Commission's procedural rules.

## **II. Applicable Procedural Rules**

Ohio Adm. Code 4901-1-13(A) specifically permits parties to move for extensions of time to file testimony. That rule provides such motions may be granted for “good cause shown.”

Ohio Adm. Code 4901-1-12(C) allows parties to request an expedited ruling on their motions. The rule also notes that if the moving party certifies that no party objects to the motion being granted without the filing of a memorandum contra, the Commission or the Attorney Examiner may issue an immediate ruling.

## **III. Argument**

Pursuant to Ohio Administrative Code section 4901-1-13(A), Movant seeks an extension of time to file a section 4901:1-27-09 renewal application to January 17, 2014. This extension of time will allow for uninterrupted service to its customers. Section 4901-1-13(A) allows a movant to seek an extension for good cause shown. The extension would allow Movant to continue providing service to its customer as well as administrative ease of filing a renewal application rather than a new application.

Movant also asks the Commission for an expedited ruling as provided for by section 4901-1-12(C) of the Ohio Administrative Code. That section allows for an expedited decision in situations where the moving party does not anticipate any objections from other parties. Movant does not anticipate any objections to an expedited ruling since it is the sole party in this motion. An expedited ruling will allow Movant to determine its status with the Commission with regard to its ability to provide services to its customers as well as determining which method of renewal will best appease the Commissions wishes; both of which are primary timely concerns.

#### **IV. Conclusion**

Movant has shown good cause for the Commission to extend the deadline to file a section 4901:1-27-09 renewal application to a new deadline of January 17, 2014. For the benefit of Movant and its customers, the Commission should grant this Motion as soon as possible.

Respectfully Submitted,

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**Case No(s). 13-2342-GA-AGG**

Summary: Motion Motion to Extend the Deadline for the Expired Certificate to January 17, 2014 and for uninterrupted service. Attached to the motion are the expired certificates. electronically filed by Mr. Daniel M Best on behalf of Aspen Energy Corporation