

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of EarlyBird)	
Power LLC for Certification as a Retail)	Case No. 11-5806-GA-AGG
Natural Gas Aggregator/Broker)	
)	

**EARLYBIRD POWER LLC'S
MOTION FOR EXTENSION OF CERTIFICATE EXPIRATION DATE**

Pursuant to Section 4901-1-27-09 Ohio Administrative Code, EarlyBird Power LLC respectfully requests that the Public Utilities Commission of Ohio grant its Motion for Extension of Certification Expiration Date of its retail natural gas aggregator/broker services certification for the reasons set forth in the attached Memorandum in Support. EarlyBird Power LLC seeks an extension of time of its current certification until such time as the certificate is renewed and/or a new a certificate is granted.

Respectfully submitted on behalf of,
EarlyBird Power LLC



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MEMORANDUM IN SUPPORT

Early Bird Power LLC (“EarlyBird”) respectfully requests that the effectiveness of its Competitive Retail Natural Gas Aggregator/Broker Certificate, Number 11-231G(1), be extended until such time as the current certificate is renewed and/or a new certificate is granted. Due to an administrative oversight, EarlyBird delayed the filing of its application for renewal of its certificate, rather than November 22, 2013, as Ohio Administrative Code (“O.A.C.”) Rule 4901:1-27-09(A) would otherwise require. As EarlyBird’s current certificate expired on December 22, 2013, and the Public Utilities Commission of Ohio (“the Commission”) has 30 days to review the application for renewal, an extension is necessary to ensure the continuity of certification.

EarlyBird is an energy market expert that provides energy management and sustainability solutions to commercial, municipal, and industrial clients across the United States. A licensed broker in natural gas and electricity in every deregulated market, EarlyBird uses its energy market expertise and key relationships with many wholesale suppliers to help its clients save money and “go green.” EarlyBird advises an array of clients, including major hospitals, towns, breweries, factories, schools, property management companies, hotels, restaurants, and others about the competitive energy marketplace and how to use it to save money.

It is reasonable for the Commission to extend EarlyBird's certification. See, *In the Matter of the Application of the City of Norwood*, Case No. 10-390-GA-GAG (Entry dated May 10, 2012) (where the Commission granted applicant's motion for extension of expiration date, although the initial expiration date had already passed). Granting EarlyBird's request for extension of certification expiration date until its certificate is renewed and/or a new certificate is granted will allow EarlyBird to continue to provide its services and avoid the administrative upheaval that could occur if its certification is cancelled.

EarlyBird submits that there is no reason or circumstance that warrants suspension or rescission of its certificate. There have been no material or adverse changes in its financial or operational status or its ability to provide the services it seeks certification to provide to Ohio customers. EarlyBird will continue to provide the Commission information as required by the Commission regarding EarlyBird's activities in Ohio. EarlyBird will continue to comply with all Ohio rules and regulations.

EarlyBird respectfully requests that the Commission extend the current certificate until such time as the certificate is renewed as to allow adequate time for processing of its renewal application/or a new certificate is granted.

Respectfully submitted on behalf of,
EarlyBird Power LLC



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Summary: Motion Motion to extend certificate expiration date electronically filed by Teresa Orahod on behalf of Dylan Borchers