

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of the Application)	
of City of Toronto for Certification)	Case No. 12-0514-EL-GAG
As a Governmental Aggregator)	

**MOTION FOR EXTENSION OF CERTIFICATE EXPIRATION DATE AND
MEMORANDUM IN SUPPORT**

I. MOTION FOR EXTENSION

Now comes FirstEnergy Solutions Corp. (“FES”) on behalf of The City of Toronto (“the City”) and moves that the Public Utilities Commission of Ohio (“Commission”) grant an extension of the March 4, 2014, expiration date of its certificate to provide governmental aggregation services. FES is the current supplier for the City’s governmental aggregation program. FES routinely assists governmental aggregation communities it serves, like the City, with making their required renewal filings to the PUCO. Due to the timing of the City’s meeting, the only opportunity for renewal applications to be formally reviewed and signed, FES was unable to obtain signatures for the renewal application from the City prior to March 4, 2014. As a result of this timing problem a complete renewal application was not submitted within the 30–120 day advance window set forth in rule 4901:1-27-09 of the Ohio Administrative Code (“OAC”). The City’s renewal application will instead be filed by March 10, 2014, and the City seeks an extension of its certificate’s expiration date while the Commission is considering the renewal application.

II. MEMORANDUM IN SUPPORT

The City was granted the authority to provide governmental aggregation services and its current certificate expires on March 4, 2014. Due the City’s meeting schedule, where renewal applications would be reviewed and signed, the application could not be reviewed in a timely manner. The City will file its renewal application on March 10, 2014. While the Commission

considers the renewal, the City requests an extension of the expiration date of its certificate from March 4, 2014, to April 9, 2014, to allow for the thirty day review period from the March 10, 2014, renewal application filing date.

The City's request for an extension is reasonable under the circumstances and should be granted. Should the City's ability to provide aggregation services expire on March 4, 2014, the City's aggregation participants would be at a disadvantage in that they would not be able to receive the most competitive electric rate. Although the renewal application was not filed 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 the City's operation of its aggregation program. The City has done nothing that would warrant suspension or rescission of its authority. An extension would allow the City to obtain renewal of its certificate without causing inconvenience to its participants. The City respectfully submits that an extension of its certificate expiration date is in the public interest.

Wherefore, FirstEnergy Solutions Corp on behalf of The City of Toronto respectfully urges the Commission to grant the extension.

Respectfully submitted,

/s/ Jacob A. McDermott

Jacob A McDermott (0087187)
FIRSTENERGY SERVICE COMPANY
76 South Main Street
Akron, OH 44308
(330) 384-5038
(330) 384-3875 (fax)
jmcdermott@firstenergycorp.com

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

3/10/2014 10:18:32 AM

in

Case No(s). 12-0514-EL-GAG

Summary: Motion MOTION FOR EXTENSION OF CERTIFICATE EXPIRATION DATE AND
MEMORANDUM IN SUPPORT electronically filed by Mr. Benjamin T Rich on behalf of
FirstEnergy Solutions