

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of the Application	)	Case No 14-0427-EL-GAG
of Washington Township for Certification	)	
As a Governmental Aggregator	)	Case No 12-0513 -EL-GAG

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

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**I. MOTION FOR EXTENSION**

Now comes FirstEnergy Solutions Corp. (“FES”) on behalf of Washington Township (“the Township”) and moves that the Public Utilities Commission of Ohio (“Commission”) grant an extension of the expiration date of its certificate to provide governmental aggregation services granted by the Commission under Case No. 12-0513-EL-GAG. FES is the current supplier for the Township’s governmental aggregation program. FES routinely assists governmental aggregation communities it serves, like the Township, with making their required renewal filings to the PUCO. Due to the timing of the Township’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 Township prior to February 3, 2014. As a result of this timing problem a complete renewal application was not submitted within the 30–60 day advance window set forth in rule 4901:1-24-09 of the Ohio Administrative Code (“OAC”). Given that the time for the renewal has passed the Township has filed an application for a new certificate concurrent with this motion, and the Township seeks an extension of its current certificate’s expiration during the pendency of the Commission’s considering review of the Township’s new application.

## **II. MEMORANDUM IN SUPPORT**

The Township was granted the authority to provide governmental aggregation services and without extension its current certificate will have expired on March 4, 2014. Due the Township's meeting schedule, where renewal applications would be reviewed and signed, the application could not be reviewed in a timely manner. The Township has filed a new application concurrent with this motion. While the Commission considers the new application, the Township requests an extension of the expiration date of its certificate from March 4, 2014, to April 17, 2014 to allow for the thirty day review period from the March 17, 2014 date of new certificate application.

The Township's request for an extension is reasonable under the circumstances and should be granted. If the Commission does not grant this request to extend its certificate under Case No. 12-0513-EL-GAG, the Township's ability to legally provide aggregation services would be in question, this would put the Township's aggregation participants at a disadvantage in that they would not be able to receive the lower electric rates they currently enjoy since they would be potentially forced back to higher priced SSO service. Although a renewal application was not filed within the 30-60 day window as set forth in Rule 4901:1-24-09 (A), in substance there have been no material changes in the Township's operation of its aggregation program as is clear from its new certificate application. The Township has done nothing that would warrant suspension or rescission of its authority. An extension would allow the Township to obtain a new certificate under this case number (14-0427-EL-GAG) without causing undue hardship or inconvenience to its participants. The Township respectfully submits that an extension of its certificate expiration date under Case No. 12-0513-EL-GAG is in the public interest.

Wherefore, FirstEnergy Solutions Corp. on behalf of Washington Township respectfully urges the Commission to grant the extension.

Respectfully submitted,

/s/ Jacob A. McDermott

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**Case No(s). 14-0427-EL-GAG, 12-0513-EL-GAG**

Summary: Motion For Extension electronically filed by Mr. Jacob A McDermott on behalf of FirstEnergy Solutions Corp.