

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of the Application)	Case No 14-0557-EL-GAG
of the Village of Hanoverton for Certification)	
As a Governmental Aggregator)	Case No 12-0464-EL-GAG

**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 Village of Hanoverton (“the Village”) 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. 12-0464-EL-GAG. FES is the current supplier for the Village’s governmental aggregation program. FES routinely assists governmental aggregation communities it serves, like the Village, with making their required renewal filings to the PUCO. Due to the timing of the Village’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 Village prior to January 28, 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 Village has filed an application for a new certificate concurrent with this motion, and the Village seeks an extension of its current certificate’s expiration during the pendency of the Commission’s considering review of the Village’s new application.

II. MEMORANDUM IN SUPPORT

The Village was granted the authority to provide governmental aggregation services and without extension its current certificate will have expired on February 26, 2014. Due the Village's meeting schedule, where renewal applications would be reviewed and signed, the application could not be reviewed in a timely manner. The Village has filed a new application on April 8, 2014 under Case No. 14-0557-EL-GAG. While the Commission considers the new application, the Village requests an extension of the expiration date of its certificate from February 26, 2014, to May 6, 2014 to allow for the thirty day review period from the April 8, 2014 date of new certificate application.

The Village'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. 12-0464-EL-GAG, the Village's ability to legally provide aggregation services would be in question, this would put the Village'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 Village's operation of its aggregation program as is clear from its new certificate application. The Village has done nothing that would warrant suspension or rescission of its authority. An extension would allow the Village to obtain a new certificate under this case number (14-0557-EL-GAG) without causing undue hardship or inconvenience to its participants. The Village respectfully submits that an extension of its certificate expiration date under Case No. 12-0464-EL-GAG is in the public interest.

Wherefore, FirstEnergy Solutions Corp on behalf of the Village of Hanoverton 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

4/9/2014 9:35:37 AM

in

Case No(s). 14-0557-EL-GAG

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