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THE PUBLIC UTILITIES COMMISSION OF OHIO PUCO

In the Matter of the Renewal Application of City of Bucyrus for Certification as a Governmental Aggregator

Case No. 13-760 E (-646

CITY OF BUCYRUS GOVERNMENT ELECTRIC AGGREGATION PROGRAM MOTION FOR EXTENSION

Pursuant to Ohio Administrative Code Rule 490:1-24-09(B), City of Bucyrus ("Bucyrus"), respectfully moves the Public Utilities Commission of Ohio to extend the expiration date of Certificate No. 13-683E(1) issued in this matter on April 28, 2013. Certificate No. 13-683E(1) is due to expire on April 28, 2015, and Bucyrus requests that its expiration date be extended to 31 days after the contemporaneous filing of Bucyrus' certificate renewal application in this matter or until the date that the new certificate is issued.

The grounds for this Motion are set forth in the attached Memorandum in Support.

Respectfully Submitted

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Counsel for City of Bucyrus

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Renewal Application of City of Bucyrus for Certification as a Governmental)	Case No.	
Aggregator	ý		

MEMORANDUM IN SUPPORT OF CITY OF BUCYRUS' MOTION FOR EXTENSION

Contemporaneously with this Motion for Extension, The City of Bucyrus ("Bucyrus"), filed its Renewal Application for Certification as a Competitive Retail Electric Service Provider - Governmental Aggregator ("Renewal Application") in Case No. 13-0760-EL-GAG. Unfortunately, through inadvertence, Bucyrus did not file its Renewal Application at least 30 days prior to the expiration of Certificate No. 13-683E(1), as required by Ohio Administrative Code Rule 4901:1-24-09(A). Bucyrus regrets the delay in filing its Renewal Application and assures the Commission that it will use every effort to file future renewal applications in a timely manner.

Ohio Administrative Code Rule 4901:1-24-09(B) provides that a motion requesting an extension of a certificate will be deemed automatically approved (unless the Commission or an attorney examiner rules otherwise within three days of the motion's filing), if a renewal application is filed fewer than thirty calendar days prior to the certificate's expiration date, but no later than the expiration date. Bucyrus' Renewal Application and this contemporaneous Motion for Extension have been filed within the applicable time frames provided by Ohio Administrative Code Rule 4901:1-24-09(B).

Therefore, Bucyrus respectfully moves the Commission to automatically extend the expiration date of Certificate No. 13-683E(1), which is due to expire on April 28, 2015, for a period of 31 days after filing Bucyrus' Renewal Application or until the date that the new certificate is issued.

Respectfully Submitted,

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