## **BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of North	:	1
American Power and Gas, LLC for	:	
Renewal Certification as a Competitive	:	
Retail Natural Gas Marketer	:	

Case No. 12-1134-GA-CRS

## MOTION OF NORTH AMERICAN POWER AND GAS, LLC FOR A THIRTY (30) DAY EXTENSION OF ITS CERTIFICATE

North American Power and Gas, LLC ("NAPG") hereby moves the Commission, pursuant to Ohio Admin. Code 4901:1-27-09, for a thirty (30) day extension of its Certificate No. 12-249G(2), from May 4, 2016, to June 3, 2016. A Memorandum in Support of this Motion is attached hereto.

Respectfully submitted,

Margeaux Kimbrough (0085152) Christopher J. Allwein (0084914) KEGLER BROWN HILL & RITTER 65 East State Street, Suite 1800 Columbus, Ohio 43123 Telephone: (614) 462-5400 Facsimile: (614) 464-2634 <u>mkimbrough@keglerbrown.com</u> *Counsel for North American Power and Gas, LLC* 

## **MEMORANDUM IN SUPPORT**

NAPG hereby requests a thirty (30) day extension of its Certificate No.12-249G(2), pursuant to Admin. Code 4901:1-27-09. NAPG's certificate became effective on May 4, 2014, and expires on May 4, 2016.

Rule 4901:1-29-09(B) provides, in pertinent part:

Any renewal application filed fewer than thirty calendar days prior to the expiration date indicated on the certificate, but no later than the expiration date on the certificate, shall be filed with a motion requesting an extension of the certificate. If the motion is filed in conformance with rule 4901:1-27-07 of the Administrative Code, it shall be deemed automatically approved unless, within three business days of its filing, the commission or an attorney examiner appointed by the commission rules otherwise.

Under Admin. Code 4901:1-27-09, NAPG's Renewal Application was due to be filed no less than thirty (30) days prior to the expiration date indicated on its provider certificate, or April 4, 2016. NAPG has not yet filed its Renewal Application and requests the additional time in order to complete the preparation of its Renewal Application and supporting exhibits.

For the all of the foregoing reasons, North American Power and Gas, LLC respectfully requests that its Certificate No. 12-249G(2) be automatically extended for thirty (30) days, until June 3, 2016, as permitted in Rule 4901:1-27-09.

Respectfully submitted,

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Case No(s). 12-1134-GA-CRS

Summary: Motion For Thirty (30) Day Extension of Certificate electronically filed by Ms. Margeaux Kimbrough on behalf of North American Power and Gas, LLC