

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Union)
Township as a Competitive Retail Electric) Case No. 14-1351-EL-GAG
Service Provider to Provide Governmental)
Aggregation Services.)

MOTION TO EXTEND CERTIFICATION

In accordance with Ohio Adm. Code 4901:1-24-09, Union Township files this motion for an extension of Certificate No. 14-868E(1) issued by the Public Utilities Commission of Ohio (Commission) in Case No. 14-1351-EL-GAG, which certified Union Township as a competitive retail electric service provider to provide governmental aggregation services effective September 13, 2014. For good cause shown, Union Township respectfully requests that the Commission extend Certificate No. 14-868E(1) so that it will remain in effect for such time as the Commission deems necessary to perform its review of the forthcoming renewal application and avoid any break in the certificate. The basis for this motion is set forth in the accompanying memorandum in support.

Respectfully submitted,

/s/ Ryan P. O'Rourke
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On behalf of Union Township

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Union)
Township for Certification as a Competitive) Case No. 14-1351-EL-GAG
Retail Electric Service Provider to Provide)
Governmental Aggregation Services.)

MEMORANDUM IN SUPPORT

The Commission issued Certificate No. 14-868E(1), which certified Union Township as a competitive retail electric service provider to provide governmental aggregation services effective September 13, 2014. By its terms, the certificate is set to expire on September 13, 2016. Unfortunately, a renewal application to extend the effectiveness of the certificate will not be filed within the time period prescribed by Ohio Adm. Code 4901:1-24-09(A). Accordingly, additional time is needed to prepare the forthcoming renewal application and compile the supporting exhibits.

In order to afford Union Township the requisite time to prepare and file its forthcoming renewal application, Union Township respectfully requests an extension of its certificate. The extension should remain in effect for such time as the Commission deems necessary to perform its review of the forthcoming renewal application and avoid any break in the certificate. Granting an extension of the certificate would be in accord with Commission precedent and will not prejudice any party.¹

¹ See, e.g., *In the Matter of the Application of Community Energy Advisors, LLC for Certification as a Competitive Retail Natural Gas Aggregator/Broker*, Case No. 13-2139-GA-AGG, Entry at 2 (December 21, 2015) (extending expiration date of certificate even though the expiration date had passed); *In the Matter of the Application of Diversegy, LLC for Certification as a Competitive Retail Natural Gas Aggregator/Broker*, Case No. 12-2880-GA-AGG, Entry at 1-2 (November 19, 2014) (extending expiration date of certificate to allow time to prepare renewal application and compile supporting exhibits); *In the Matter of the Application of the City of Norwood, Ohio for Certification to Provide Natural Gas Governmental Aggregation Service in Ohio*, Case No. 10-0390-GA-GAG, Entry at 1 (May 10, 2012) (extending expiration date of certificate even though the expiration date had passed).

For the foregoing reasons, the motion should be granted.

Respectfully submitted,

/s/ Ryan P. O'Rourke
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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/12/2016 5:03:04 PM

in

Case No(s). 14-1351-EL-GAG

Summary: Motion Motion to Extend Certification electronically filed by Ms. Cheryl A Smith on behalf of Union Township