

**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. 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 renewal application¹ 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

¹ The renewal application has been filed contemporaneously with this motion.

**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 was set to expire on September 13, 2016; however, on September 12, 2016, Union Township filed a motion to extend the certificate while it prepared the renewal application and compiled the supporting exhibits.²

In order to continue the effectiveness of Union Township's certificate and to provide adequate time for the Commission to review the 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 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.³

² Union Township's Motion to Extend Certificate at 1-2, Case No. 14-1351-EL-GAG (September 12, 2016).

³ 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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On behalf of Union Township

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

Summary: Motion To Extend Certification electronically filed by Debra A Gaunder on behalf of Trebel LLC