FILE

BEFORE THE PUBLIC UTILITES COMMISION OF OHIO

In the Matter of the Renewal Application)	
Of EnerCom, Inc. as a Competitive)	Case No. 14-1574-GA-AGG
Retail Natural Gas Broker)	

EMERGENCY MOTION TO EXTEND CERTIFICATION EXPIRATION DATE

Pursuant to Ohio Administrative Code 4901-1-12(C), EnerCom, Inc.

("Applicant"), respectfully moves that the Public Utilities Commission of Ohio

("Commission"), on an expedited basis, extend the current expiration date of

Applicant's certificate as a Competitive Retail Natural Gas Broker for a reasonable

period of time to allow the Commission to evaluate Applicant's renewal application.

A Memorandum in Support is submitted herewith.

Respectfully, Submitted,

Kevin Schmidt (#86722) Attorney for Applicant

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MEMORANDUM IN SUPPORT

EnerCom, Inc. (Applicant) submits this Memorandum in support of its

Emergency Motion requesting that the Public Utilities Commission of Ohio

("Commission") act on an expedited basis to extend for a reasonable period of time the expiration date of Applicant's certificate as a Competitive Retail Natural Gas

Broker to provide retail natural gas broker services, to allow the Commission to evaluate Applicant's renewal application.

Applicant is certified as a retail natural gas broker in the State of Ohio pursuant to its Certificate Number 14-392G(1), which was issued by the Commission effective October 10th, 2014. Due to a clerical error, Applicant failed to submit its renewal application for said Certificate minimum of thirty (30) days before the Certificate was set to expire. Applicant therefore requests the expiration date of its Certificate be extended from October 10th, 2016 for a reasonable period of time so as to allow the Commission the opportunity to evaluate Applicant's renewal application.

Applicant respectfully submits that a brief extension of the expiration date of Applicant's Certificate will not harm stakeholders in any way. In fact, a brief extension is in the best interest of Applicant's customers to ensure that they receive

continuous service from their chosen supplier, while still allowing the Commission adequate oversight over the potential renewal of Applicant's Certificate to provide electric aggregation and power broker services in Ohio. Applicant respectfully apologizes for the inconvenience caused by its tardy renewal application and the consequent necessity of the instant Motion for emergency action by the Commission; and applicant promises that future renewals will be submitted in a timely fashion.

Due to the expiration of its Certificate, Applicant seeks a Commission ruling on the instant Motion on an expedited basis pursuant to Ohio Administrative Code 4901-1-12(C).

Respectfully, Submitted,

Kevin Schmidt (#86722)

y for Applicant Enerdom, Inc.

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