### BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

:

IN THE MATTER OF THE
APPLICATION OF CHOICE ENERGY
SERVICES RETAIL, LP FOR
CERTIFICATION AS A COMPETITIVE
RETAIL ELECTRIC GENERATION
BROKER/AGGREGATOR

CASE NO. 14-1265-GA-AGG

### CHOICE ENERGY SERVICES RETAIL, LP'S MOTION TO EXTEND ITS PREVIOUS CERTIFICATE DURING THE PENDENCY OF THE REVIEW AND APPROVAL OF ITS NEW APPLICATION FOR CERTIFICATION AS A COMPETITIVE RETAIL NATURAL GAS BROKER/AGGREGATOR

Choice! Energy Services Retial, LP ("Choice" or "Company") hereby moves, pursuant to Ohio Administrative Code ("OAC") Rule 4901:1-27-04, to extend its previously granted certificate, Certificate Number 14-1265-GA-AGG, during the pendency of the review and approval of its Application for Certification as a Competitive Retail Natural Gas Broker/Aggregator. A Memorandum in Support is attached hereto.

Respectfully submitted,

<u>/s/ Christopher L. Miller</u> Christopher L. Miller (0063259) (Counsel of Record) Jeremy M. Grayem (0072402) ICE MILLER LLP 250 West Street Columbus, Ohio 43215 Telephone: (614) 462-2700 Facsimile: (614) 222-2440 Email: christopher.miller@icemiller.com jeremy.grayem@icemiller.com

Attorneys for Choice! Energy Services Retail, LP

#### MEMORANDUM OF SUPPORT

On July 16, 2014, Choice submitted its Certification Application to become a Competitive Retail Natural Gas Broker/Aggregator in Ohio. Effective August 16, 2014, Choice was issued a certificate as a Competitive Retail Natural Gas Broker/Aggregator, Certificate No. 14-1265-GA-AGG. That certificate expired on August 16, 2016, and Choice was unable to renew the certificate before the expiration date. Pursuant to OAC Rule 4901:1-27-04, any Competitive Retail Natural Gas Broker/Aggregator, within sixty (60) days of its certificate's expiration, may request to extend its previous certificate during the pendency of the review of a new Application. Simultaneously with the filing of this Motion, Choice is submitting a new Initial Certification Application - Competitive Retail Natural Gas Broker/Aggregator in Case No. 16-2004-GA-AGG. Further, this request shall be deemed automatically approved if filed in conformance with OAC Rules 4901:1-27-07.

Choice's Motion to Extend its Previous Certificate is filed in conformance with the Commission Rules, specifically OAC Rule 4901:1-27-04 and 07. Further, Choice's Motion was filed less than sixty (60) days from the expiration of its previous certificate (which will be October 16, 2016), as provided by the OAC. For all of the foregoing reasons, Choice respectfully requests that its Certificate No. 14-1265-GA-AGG be extended pending the review and approval of its newly filed Initial Certification Application - Competitive Retail Natural Gas Aggregator/Broker.

Respectfully submitted,

/s/ Christopher L. Miller Christopher L. Miller (0063259) Jeremy M. Grayem (0072402) ICE MILLER LLP 250 West Street Columbus, Ohio 43215 Telephone: (614) 462-2700 Facsimile: (614) 222-2440 Email: christopher.miller@icemiller.com jeremy.grayem@icemiller.com

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Summary: Motion Choice Energy Services Retail, LP's Motion to Extend its Previous Certificate During the Pendency of the Review and Approval of its New Application for Certification as a Competitive Retail Natural Gas Broker/Aggregator electronically filed by Mr. Christopher L. Miller on behalf of Choice! Energy Services Retail, LP