

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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|--|---|-------------------------|
| In the Matter of the Application of Titan Energy - |) | |
| New England, Inc. for Certification as a Competitive |) | Case No. 13-0535-EL-AGG |
| Retail Electric Service Provider. |) | |

**TITAN ENERGY - NEW ENGLAND'S
MOTION FOR EXTENSION**

Pursuant to Ohio Administrative Code Rule 490:1-24-09(B), Titan Energy - New England, Inc. ("Titan"), respectfully moves the Public Utilities Commission of Ohio to extend the expiration date of Certificate No. 13-665E(2) issued in this matter effective April 5, 2015. Certificate No. 13-665E(2) is due to expire on April 5, 2017, and Titan requests that its expiration date be extended to 31 days after the contemporaneous filing of Titan's certificate renewal application in this matter or until the date that the new certificate is issued.

The grounds for this Motion are set forth in the attached Memorandum in Support.

Respectfully Submitted,



Dane Stinson (0019101)
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Counsel for Titan Energy - New England, Inc.

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**MEMORANDUM IN SUPPORT OF TITAN ENERGY - NEW ENGLAND'S
MOTION FOR EXTENTION**

Contemporaneously with this Motion for Extension, Titan Energy - New England, Inc. ("Titan"), filed its Renewal Application for Certification as a Competitive Retail Electric Service Provider ("Renewal Application") in Case No. 13-0535-EL-AGG. Unfortunately, through inadvertence, Titan did not file its Renewal Application at least 30 days prior to the expiration of Certificate No. 13-665E(2), as required by Ohio Administrative Code Rule 4901:1-24-09(A). Titan regrets the delay in filing its Renewal Application and will use every effort to file future renewal applications in a timely manner.

Ohio Administrative Code Rule 4901:1-24-09(B) provides that a motion requesting an extension of a certificate will be deemed automatically approved (unless the Commission or an attorney examiner rules otherwise within three days of the motion's filing), if a renewal application is filed fewer than thirty calendar days prior to the certificate's expiration date, but no later than the expiration date. Titan's Renewal Application and this contemporaneous Motion for Extension have been filed within the applicable time frames provided by Ohio Administrative Code Rule 4901:1-24-09(B).

Therefore, Titan respectfully moves the Commission to automatically extend the expiration date of Certificate No. 13-665E(2), which is due to expire on April 5, 2017, for a period of 31 days

days after the filing of Titan's Renewal Application or until the date that the new certificate is issued.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Dane Stinson".

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Case No(s). 13-0535-EL-AGG

Summary: Motion to Extend electronically filed by Dane Stinson on behalf of Titan Energy - New England, Inc.