

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Public Power, LLC for a	)	Case No. 11-5815-EL-CRS
Certificate to Provide Competitive	)	
Retail Electric Service in Ohio	)	

---


**MOTION FOR EXTENSION**

---

Pursuant to Rule 4901:1-24-09(B) of the Ohio Administrative Code, Public Power, LLC ("Public Power") seeks an extension of Certificate No. 11-418E (3) which was issued in Case No. 11-5815-EL-CRS. The expiration date of Certificate No. 11-418E (3) is December 24, 2017. Due to the press of other business, Public Power was not able to file its renewal application on time. It has now filed its renewal application on December 11, 2017 which is thirteen calendar days prior to the December 24, 2017 expiration date. Public Power respectfully requests that Certificate No. 11-418E (3) be automatically extended from December 24, 2017 until January 10, 2018 or until the date that the renewal certificate is issued.

WHEREFORE, Public Power, LLC respectfully requests that Certificate No. 11-418E (3) be automatically extended to January 10, 2018 or until a renewal certificate is issued and authorize it to continue to operate during the pendency of the renewal application certification review.

Respectfully submitted,

  
\_\_\_\_\_  
Stephen M. Howard (0022421)  
Gretchen L. Petrucci (0046608)  
Vorys, Sater, Seymour and Pease LLP  
52 East Gay Street  
Columbus, Ohio 43215  
(614) 464-5401  
[smhoward@vorys.com](mailto:smhoward@vorys.com)  
[glpetrucci@vorys.com](mailto:glpetrucci@vorys.com)

*Attorney for Public Power, LLC*

**MEMORANDUM IN SUPPORT OF  
MOTION FOR EXTENSION**

---

Due to the press of other business, Public Power did not meet the November 24, 2017 filing date for its Renewal Application in Case No. 11-5815-EL-CRS. Public Power sincerely apologizes for the delay and emphasizes its desire to continue to serve customers in Ohio.

Rule 4901:1-24-09(B) provides that a motion requesting an extension of a certificate will be deemed automatically approved (unless ruled otherwise by the Commission or an Attorney Examiner within three business days), if a renewal application is filed fewer than thirty calendar days prior to the expiration date of the certificate but no later than the expiration date. Public Power submits that it has met the criteria and respectfully requests an automatic extension of the expiration date of Certificate No. 11-418E (3) issued in Case No. 11-5815-EL-CRS to January 10, 2018 or until such time as a renewal certificate is issued.

Respectfully submitted,



---

Stephen M. Howard (0022421)  
Gretchen L. Petrucci (0046608)  
Vorys, Sater, Seymour and Pease LLP  
52 East Gay Street  
P.O. Box 1008  
Columbus, Ohio 43216-1008  
(614) 464-5414  
[smhoward@vorys.com](mailto:smhoward@vorys.com)  
[glpetrucci@vorys.com](mailto:glpetrucci@vorys.com)

*Attorney for Public Power, LLC*

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**12/11/2017 4:02:21 PM**

**in**

**Case No(s). 11-5815-EL-CRS**

Summary: Motion for Extension electronically filed by Mr. Stephen M Howard on behalf of Public Power, LLC