## Buchanan Ingersoll & Rooney PC

Alan M. Seltzer 717 237 4862 alan.seltzer@bipc.com 409 N. Second Street, Suite 500 Harrisburg, PA 17101-1357 T 717 237 4862 F 717 233 0852 www.bipc.com

July 9, 2018

## **VIA E-FILING**

Public Utilities Commission of Ohio Docketing Division 180 East Broad Street Columbus, OH 43215-3793

Re:

ENGIE Resources LLC's Motion for Extension of its Certificate

Case No. 04-1015-EL-CRS; Certificate No. 04-118E(1)

**Dear Docketing Division:** 

Pursuant to Ohio Administrative Code 4901:1-24, ENGIE Resources LLC ("ENGIE") hereby submits for filing with the Public Utilities Commission of Ohio ("PUCO") a Motion for Extension of its Certificate as a Competitive Retail Electric Service Provider/Power Marketer and a Memorandum in Support. In its Motion and Memorandum in Support, ENGIE requests an extension of its existing Certificate No. 04-118E(1) from July 25, 2018 to July 31, 2018 in order to provide the PUCO the minimum thirty day time period required under its regulations to consider and evaluate ENGIE's Renewal Application for Certification as a Competitive Retail Electric Service Provider/Power Marketer, which was docketed on June 27, 2018, in the above-referenced case number.

If you have any questions concerning this filing, please contact me at your convenience.

Very truly yours,

Alan M. Seltzer

OH Bar No. 0074908

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AMS/gm Attachments

cc: Melissa Scarberry (w/Attachments) (via e-mail)

## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Renewal Application of ENGIE Resources LLC for Certification as a Competitive Retail Electric Supplier/Power Marketer	) ) Case No. 04-1015-EL-CRS )
MOTION OF ENGIE RESOURCES LLC FOR EXTENSION OF ITS CERTIFICATE	
19 FX W O M MST 1000-1	ursuant to Ohio Administrative Code 4901:1-24 for Certificate No. 04-118E(1), from July 25, 2018 to this Motion is attached hereto.
	Respectfully submitted,
	Clan Michael Soltzer Esa

Alan Michael Seltzer, Esq. Ohio Bar No. 0074908

Buchanan Ingersoll & Rooney PC 409 North Second Street, Suite #500

Harrisburg, PA 17101-1357 Telephone: (717) 237-4862 alan.seltzer@bipc.com

Dated: July 9, 2018 Counsel for ENGIE Resources LLC

## MEMORANDUM IN SUPPORT

On June 25, 2018, ENGIE Resources LLC ("ENGIE") submitted its License Renewal Application (the "Renewal Application") to the Ohio Public Utilities Commission ("PUCO") for the continued provision of retail electric energy in Ohio; however, the Renewal Application was not received and docketed at the Ohio Public Utilities Commission until June 27, 2018 – providing the PUCO with less than the thirty (30) days required under existing PUCO regulations for the PUCO to review and approve the Renewal Application. ENGIE's existing electric license certificate expires on July 25, 2018.

PUCO Rule 4901:1-24-09(B) provides in pertinent part:

(B) Any renewal application filed fewer than thirty calendar days prior to the expiration date indicated on the certificate, but no later than the expiration date on the certificate, shall be filed with a motion requesting an extension of the certificate. If the motion is filed in conformance with rule 4901:1-24-07 of the Administrative Code, it shall be deemed automatically approved unless, within three business days of its filing, the commission or an attorney examiner appointed by the commission rules otherwise.

Because ENGIE's Renewal Application was not (i) received and docketed in such a way as to allow the PUCO the full thirty (30) day time period required under its regulations to consider and evaluate the Renewal Application and (ii) filed with an accompanying Motion for Extension, ENGIE is filing this Motion for Extension as requested by PUCO staff. Accordingly, ENGIE hereby respectfully requests an extension of its existing Certificate No. 04-118E(1), until July 31, 2018. This extension will provide PUCO with the requisite thirty (30) days within which to evaluate and approve the Renewal Application.

For all the foregoing reasons stated above, ENGIE respectfully requests that its existing Certificate No. 04-118E(1) be extended until July 31, 2018, to allow PUCO at least thirty (30) days to review its Renewal Application.

Respectfully submitted,

Curin Mhal Selfas
Alan Michael Seltzer, Esq.

Ohio Bar No. 0074908

Buchanan Ingersoll & Rooney PC 409 North Second Street, Suite #500

Harrisburg, PA 17101-1357 Telephone: (717) 237-4862

alan.seltzer@bipc.com

Dated: July 1, 2018 Counsel for ENGIE Resources LLC

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in

Case No(s). 04-1015-EL-CRS

Summary: Motion ENGIE Resources LLC's Motion for Extension of its Certificate electronically filed by Ms. Gina Y Myers on behalf of Seltzer, Alan M.