

## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Realgy, dba Realgy Energy Services for Certification as an Ohio Competitive Retail Natural Gas Aggregator/Broker.

Case No. 16-1117-GA-CRS

## REALGY, DBA REALGY ENERGY SERVICES MOTION FOR EXTENSION OF CERTIFICATE EXPIRATION DATE

Pursuant to Ohio Administrative Code ("O.A.C.") Rule 4901:1-27-4, Realgy, dba Realgy Energy Services ("Realgy") respectfully requests the date for the expiration of its current certification as an Ohio Competitive Retail Natural Gas Aggregator/Broker be extended until August 31, 2018, or until a new certificate is granted. The reasons supporting this motion are contained in the attached Memorandum in Support.

> Respectfully submitted on behalf of, REALGY, DBA REALGY ENERGY SERVICES

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Devin D. Parram BRICKER & ECKLER LLP 100 South Third Street Columbus, OH 43215 Telephone: (614) 227-8813 Facsimile: (614) 227-2390 E-Mail: dparram@bricker.com

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## **MEMORANDUM IN SUPPORT**

Realgy, dba Realgy Energy Services ("Realgy") respectfully requests that the effectiveness of its Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate Number 16-523G(1) be extended until August 31, 2018, or until a new certificate is granted. Ohio Administrative Code ("O.A.C.") Rule 4901:1-27-04 states:

Any retail natural gas supplier or governmental aggregator that fails to file an application for certification renewal pursuant to rule 4901:1-27-09 of the Administrative Code prior to the expiration date on the certificate must file a new application for certification in a new case and may request, no later than sixty days after the expiration date on the certificate, to extend its previous certificate during the pendency of the new application review.

Due to an administrative oversight, Realgy delayed the filing of its application for renewal of its certificate, rather than May 18, 2018, as O.A.C. Rule 4901:1-27-09(A) would otherwise require. As Realgy's current certificate expired on June 18, 2018, and the Public Utilities Commission of Ohio ("Commission" or "PUCO") has 30 days to review the application for renewal which was filed on June 18, 2018, an extension is necessary to ensure the continuity of certification.

Realgy is a private and independently owned energy services company and retail marketer of natural gas and electricity. Realgy provides competitive natural gas service to customers served by Duke Energy Ohio with the intent of providing service to customers served by Columbia Gas of Ohio, Dominion Energy Ohio, and Vectren Energy Delivery Ohio.

It is reasonable for the Commission to extend Realgy's certification. See, *In the Matter of the Application of Summit Energy Services*, Case No. 13-1175-GA-GAG, Entry, (November 7, 2017) (where the Commission granted applicant's motion for extension of expiration date, although the expiration had already passed 132 days); and *In the Matter of the Application of the City of Norwood*, Case No. 10-390-GA-AGG, Entry, (May 10, 2012) (where the Commission granted applicant's motion for extension of expiration had already passed). Granting Realgy's request for extension of certification expiration date until its certificate is renewed or a new certificate is issued will allow Realgy to continue to provide it services and avoid the administrative upheaval that could occur if its certification is cancelled.

Realgy submits that there is no reason or circumstance that warrants suspension or recision of its certificate. There have been no material or adverse changes in its financial or operational status or its ability to provide the services it seeks certification to provide to Ohio customers. Further, this is Realgy's first request for extension of its certificate. See *Summit Energy Services*, Case No. 13-1175-GA-GAG, Entry ¶5 (November 7, 2017) (where the Commission considered whether it was Summit's first motion for extension of certificate). Realgy will continue to provide the Commission information as required by the PUCO regarding Realgy's activities in Ohio, and Realgy will continue to comply with all Ohio rules and regulations.

Realgy respectfully requests that the Commission extend the current certificate through August 31, 2018, or such timeframe as to allow adequate time for processing of its application.

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Respectfully submitted on behalf of, REALGY, DBA REALGY ENERGY SERVICES

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Devin D. Parram BRICKER & ECKLER LLP 100 South Third Street Columbus, OH 43215 Telephone: (614) 227-8813 Facsimile: (614) 227-2390 E-Mail: dparram@bricker.com