## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Navigate Power, LLC, for Certification as a Competitive Natural Gas Broker/ Aggregator.

Case No. 16-1861-GA-AGG

## **MOTION FOR EXTENSION**

Pursuant to Ohio Administrative Code Rule 4901:1-27-09(B), Navigate Power, LLC ("Navigate Power") seeks an extension of Certificate No. 16-546G (1), which was issued in Case No. 16-1861-GA-AGG with an expiration date of October 9, 2018. Due to the press of other business, Navigate Power was not able to file its renewal application on time. It filed its Renewal Application on September 26, 2018, which was twelve calendar days prior to the October 9, 2018 expiration date. In support of the application, Navigate Power respectfully requests that Certificate No. 16-546G (1) be automatically extended from October 9, 2018 until November 9, 2018 or until the date that the renewal certificate is issued.

WHEREFORE, Navigate Power respectfully requests that Certificate No. 16-546G (1) be automatically extended to November 9, 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,

/s/Robert Dove Robert Dove (#0092019) Attorney & Counselor at Law PO Box 13442 Columbus, Ohio 43213 Phone: 614-286-4183 Email: rdove@attorneydove.com (Willing to accept service by email) Attorney for the Navigate Power, LLC

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## MEMORANDUM IN SUPPORT OF MOTION FOR EXTENSION

Due to the press of other business, Navigate Power did not meet the September 9, 2018 filing date for its Renewal Application in Case No. 16-1861-GA-AGG. Navigate Power sincerely apologizes for the delay and emphasizes its desire to continue to serve customers in Ohio. A Renewal Application was filed on September 26, 2018, however a Motion for Extension was mistakenly not filed along with it. Navigate Power, LLC is filing that motion as it previously should have to allow for the extension during the renewal review, which is ongoing.

Ohio Administrative Code Rule 4901:1-27-09(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. Navigate Power submits that it has met the criteria and respectfully requests an automatic extension of the expiration date of Certificate No. 16-546G (1) issued in Case No. 16-1861-GA-AGG to November 9, 2018, or until such time as a renewal certificate is issued.

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Respectfully submitted,

/s/Robert Dove

Robert Dove (#0092019) Attorney & Counselor at Law PO Box 13442 Columbus, Ohio 43213 Phone: 614-286-4183 Email: rdove@attorneydove.com (Willing to accept service by email) Attorney for the Navigate Power, LLC This foregoing document was electronically filed with the Public Utilities

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Case No(s). 16-1861-GA-AGG

Summary: Motion for an Extension and Memorandum in Support electronically filed by Mr. Robert Dove on behalf of Navigate Power, LLC