

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of the)	
Richmond Heights for Certification)	Case No. 16-2031-EL-GAG
As a Governmental Aggregator)	

**MOTION FOR EXTENSION OF CERTIFICATE EXPIRATION DATE AND
MEMORANDUM IN SUPPORT**

I. MOTION FOR EXTENSION

Now comes The City of Richmond Heights (“Richmond Heights”) and moves that the Public Utilities Commission of Ohio (“Commission”) grant an extension of the November 14, 2018, expiration date of its certificate to provide governmental aggregation services. Inadvertently, Richmond Heights did not file an application for renewal of Certificate 10-216(E) 2 within the 30–120 day advance window set forth in rule 4901:1-27-09 of the Ohio Administrative Code (“OAC”). Richmond Heights filed its renewal application, out of time, on November 6, 2018, and Richmond Heights seeks an extension of its certificate’s expiration date while the Commission is considering the renewal application.

II. MEMORANDUM IN SUPPORT

The City of Richmond Heights was granted the authority to provide governmental aggregation services on June 17, 2010, and its current certificate expires on November 14, 2018. Since that time, Richmond Heights has chosen a supplier for the retail electric services for its residents, and power is lowing to its residents under their aggregation program. Unfortunately, due to an inadvertent oversight with regard to the timing for filing, Richmond Heights did not

realize that the advance filing date for its certificate renewal has passed. Richmond Heights filed its renewal application on November 6, 2018. While the Commission considers the renewal, Richmond Heights requests an extension of the expiration date of its certificate from November 14, 2018 to December 14, 2018, to allow for the thirty day review period from the November 6, 2018 renewal application filing date.

Richmond Heights's request for an extension is reasonable under the circumstances and should be granted. Should the City's ability to provide aggregation services expire on November 14, 2018, Richmond Heights's residents would be at a disadvantage in that they would not be able to receive the most competitive electric rate. Although Richmond Heights inadvertently failed to file its renewal application within the 30-120 day window as set forth in Rule 4901:1-27-09 (A), in substance there have been no material changes in Richmond Heights's operation of its aggregation program. Indeed, except for the automatic expiration date of its Certificate 16-1147E (1), Richmond Heights has done nothing that would warrant suspension or rescission of its authority. Since Richmond Heights's dilemma has been caused by an inadvertent oversight, an extension would allow the Township to obtain renewal of its certificate without causing inconvenience to its residents. Indeed, extension of the expiration date is necessary to prevent irreparable harm to Richmond Heights and its residents, and would prevent disruption in service to Richmond Heights residents. The City of Richmond Heights respectfully submits that an extension of its certificate expiration date is in the public interest.

Wherefore, Richmond Heights respectfully urges the Commission to grant the extension.

Respectfully submitted,

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Case No(s). 16-2031-EL-GAG

Summary: Motion for extension of certificate expiration date and memorandum in support electronically filed by Ty Brocksieker on behalf of FirstEnergy Solutions and City of Richmond Heights