

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of the)	
Beloit for Certification)	Case No. 16-2097-EL-GAG
As a Governmental Aggregator)	

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

I. MOTION FOR EXTENSION

Now comes The Village of Beloit (“Beloit”) and moves that the Public Utilities Commission of Ohio (“Commission”) grant an extension of the November 24, 2018, expiration date of its certificate to provide governmental aggregation services. Inadvertently, Beloit 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”). Beloit filed its renewal application, out of time, on November 26, 2018, and Beloit seeks an extension of its certificate’s expiration date while the Commission is considering the renewal application.

II. MEMORANDUM IN SUPPORT

The Village of Beloit was granted the authority to provide governmental aggregation services on December 28, 2011, and its current certificate expires on November 24, 2018. Since that time, Beloit has chosen a supplier for the retail electric services for its residents, and power is flowing to its residents under their aggregation program. Unfortunately, due to an inadvertent oversight with regard to the timing for filing, Beloit did not realize that the advance filing date for its certificate renewal has passed. Beloit filed its renewal application on

November 26, 2018. While the Commission considers the renewal, Beloit requests an extension of the expiration date of its certificate from November 24, 2018 to December 24, 2018, to allow for the thirty day review period from the November 26, 2018 renewal application filing date.

Beloit's request for an extension is reasonable under the circumstances and should be granted. Should the Village's ability to provide aggregation services expire on November 24, 2018, Beloit's residents would be at a disadvantage in that they would not be able to receive the most competitive electric rate. Although Beloit 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 Beloit's operation of its aggregation program. Indeed, except for the automatic expiration date of its Certificate 16-1147E (1), Beloit has done nothing that would warrant suspension or rescission of its authority. Since Beloit'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 Beloit and its residents, and would prevent disruption in service to Beloit residents. The Village of Beloit respectfully submits that an extension of its certificate expiration date is in the public interest.

Wherefore, Beloit respectfully urges the Commission to grant the extension.

Respectfully submitted,

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Summary: Motion for Extension of Certificate Expiration Date and Memorandum in Support electronically filed by Ty Brocksieker on behalf of FirstEnergy Solutions and Village of Beloit