BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Optimum Power Investments, LLC for a Certificate to Provide Competitive Retail Electric Service in Ohio

Case No. 17-614-EL-CRS

MOTION FOR EXTENSION

Pursuant to Rule 4901:1-24-09(B) of the Ohio Administrative Code, Optimum Power Investments, LLC ("Optimum Power") seeks an extension of Certificate No. 17-1207E(1), which was issued in Case No. 17-614-EL-CRS. The expiration date of Certificate No. 17-1207E(1) is March 31, 2019. Due to the press of other business including a business reoganization, Optimum Power was not able to file its renewal application on time. It has now filed its renewal application on March 27, 2019 which is four calendar days prior to the March 31, 2019 expiration date. Optimum Power respectfully requests that Certificate No. 17-1207E(1) be automatically extended from March 31, 2019 until April 27, 2019 or until the date that the renewal certificate is issued.

WHEREFORE, Optimum Power Investments, LLC respectfully requests that Certificate No. 17-1207E(1) be automatically extended to April 27, 2019 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,

<u>/s/ Gretchen L. Petrucci</u> Michael J. Settineri (0073369), Counsel of Record Gretchen L. Petrucci (0046608) Vorys, Sater, Seymour and Pease LLP 52 East Gay Street Columbus, Ohio 43215 (614) 464-5407 <u>mjsettineri@vorys.com</u> <u>glpetrucci@vorys.com</u>

Attorney for Optimum Power Investments, LLC

MEMORANDUM IN SUPPORT OF MOTION FOR EXTENSION

Due to the press of other business and a business reoganization, Optimum Power did not meet the March 1, 2019 filing date for its Renewal Application in Case No. 17-614-EL-CRS. Optimum Power sincerely apologizes for the delay and emphasizes its desire to continue to serve customers in Ohio.

Rule 4901:1-24-09(B) of the Ohio Administrative Code 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. Optimum Power submits that it has met the criteria and respectfully requests an automatic extension of the expiration date of Certificate No. 17-1207E(1) issued in Case No. 17-614-EL-CRS to April 27, 2019 or until such time as a renewal certificate is issued.

Respectfully submitted,

/s/ Gretchen L. Petrucci Michael J. Settineri (0073369), Counsel of Record Gretchen L. Petrucci (0046608) Vorys, Sater, Seymour and Pease LLP 52 East Gay Street Columbus, Ohio 43215 (614) 464-5407 mjsettineri@vorys.com glpetrucci@vorys.com

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Summary: Motion Motion for Extension electronically filed by Mrs. Gretchen L. Petrucci on behalf of Optimum Power Investments, LLC