

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Save On Energy, LLC for an)	Case No. 15-1045-GA-AGG
Extension of Time)	
Pending Renewal Application)	

**MOTION FOR AN EXTENSION OF TIME TO FILE
RENEWAL APPLICATION
BY SAVE ON ENERGY, LLC**

Save On Energy, LLC (“SOE” or “Movant”) moves the Public Utilities Commission of Ohio (“PUCO” or “Commission”) to extend the time for filing the renewal application for natural gas aggregator/brokerage services it provides.¹ Specifically, Movant requests that the Commission consider the Renewal Certification Application: Competitive Retail Natural Gas Brokers/Aggregators filed in this proceeding dated June 25, 2019 (“Renewal Application”). Additionally, SOE moves that the Commission also grant an allowance to SOE to provide uninterrupted service to any customers in Ohio while its Renewal Application is pending before the Commission.

¹ Ohio Admin. Code 4901:1-27-09(B).

Respectfully submitted,



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MEMORANDUM IN SUPPORT

Pursuant to the Public Utilities Commission of Ohio's ("PUCO" or the "Commission") regulations, Save On Energy, LLC ("SOE" or "Movant") offers the following Memorandum In Support of its Motion for an Extension of Time to File Renewal Application ("Motion"):

I. Introduction

SOE has been a competitive natural gas broker and aggregator within PUCO's Certified Retail Natural Gas Service Program since June 30, 2015.¹ PUCO last approved the renewal of SOE's Competitive Retail Natural Gas Aggregator/Broker Certificate on June 30, 2017, with the certificate effective from June 29, 2017, through June 29, 2019.² SOE submitted its Renewal Certification Application: Competitive Retail Natural Gas Brokers/Aggregators ("Renewal Application") on June 25, 2019. Although SOE submitted its Renewal Application prior to the expiration of its previous certificate to participate in the Certified Retail Natural Gas Service Program, SOE recognizes that under the Commission's regulations this Renewal Application should have been submitted by May 30, 2019, or should have included a motion for an extension

¹ *Save on Energy LLC*, Pub. Util. Comm'n of Ohio, Competitive Retail Natural Gas Aggregator/Broker Certificate No. 15-447G(1) (June 30, 2015).

² *Save on Energy LLC*, Pub. Util. Comm'n of Ohio, Competitive Retail Natural Gas Aggregator/Broker Certificate No. 15-447G(2) (June 30, 2017).

of time to file the renewal application. However, in order to provide uninterrupted service to its customers, SOE requests that the Commission grant an extension for the time of filing the Renewal Application during the period during which the Renewal Application is pending before the Commission up to and including the date on which the Commission issues a new certificate to SOE.

II. Applicable Procedural Rules

At least thirty days prior to the expiration date of a retail natural gas supplier's certificate, the supplier must file an application with the Commission to renew the certificate.³ If a renewal application is filed with the Commission fewer than 30 calendar days before the certificate's expiration date, but prior to the expiration date on the certificate, the renewal application must include a motion to the Commission requesting an extension of the certificate.⁴ Motions, including motions for an extension of a certificate, must be filed by an attorney authorized to practice law in the state of Ohio.⁵

III. Argument

SOE requests that PUCO grant the extension of time request in this instant Motion because it intends to continue to serve customers in Ohio as a broker for retail natural gas service. This intent is demonstrated by SOE's submission of its Renewal Application prior to the date that the previous certificate expired.

In the past, the Commission has permitted a broker/aggregator to continue providing natural gas brokering service to despite the expiration of a competitive energy brokering and

³ Ohio Admin. Code 4901:1-27-09(A).

⁴ Ohio Admin. Code 4901:1-27-09(B).

⁵ Ohio Admin. Code 4901:1-27-07(A).

aggregating certificate while a renewal application was pending.⁶ In the case of SOE's pending Renewal Application in the docket noted above, SOE submitted its renewal application prior to the expiration of its previous certificate. The instant Motion is the final component of the Renewal Application package prior to consideration by the Commission.

Granting SOE's Motion will allow SOE to continue providing brokering and/or aggregation service to customers in Ohio and will avoid unnecessary disruption for SOE's current and prospective customers. If the Commission grants the Renewal Application, SOE will continue to provide Ohio's natural gas customers with options for competitive natural gas service. Furthermore, SOE will continue to comply with the PUCO's requirements under the Certified Retail Natural Gas Service Program. Given the harm that denying this Motion may cause to Ohio natural gas customers and the fact that SOE seeks to continue providing its valuable brokering and/or aggregation service to Ohio's energy consumers, the Commission should grant this Motion.

Therefore, SOE respectfully requests that the Commission extend the time for filing the Renewal Application and extend current certificate during the pendency of the Renewal Application before the Commission and until such time as the Commission grants a new Competitive Retail Natural Gas Aggregator/Broker Certificate.

⁶ *In the Matter of the Application of EarlyBird Power LLC for Certification as a Competitive Retail Electric Aggregator/Broker*, Pub. Util. Comm'n of Ohio Docket No. 14-0005-GA-AGG, 2014 WL 317184 (2014); *In the Matter of the Application of My Choice Energy for a Certificate to Provide Competitive Retail Natural Gas Service in Ohio*, Pub. Util. Comm'n of Ohio Docket No. 02-2583-GA-CRS, 2005 WL 1689246 (2005).

Respectfully submitted,



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Summary: Motion Motion for Extension of Time to File Renewal Application electronically filed by Mr. Michael L. O'Neill on behalf of Save On Energy, LLC