

FILE

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October 31, 2019

Public Utilities Commission of Ohio  
Docketing Division  
180 East Broad Street  
Columbus, OH 43215-3793

RECEIVED-DOCKETING DIV.  
2019 NOV -4 AM 11:37  
PUCO

**Re: In the Matter of the Application of Biofuels Technology, LLC for Certification as a Competitive Retail Electric Service Provider to Provide Power Broker Services Docket No. 15-1676-EL-AGG**

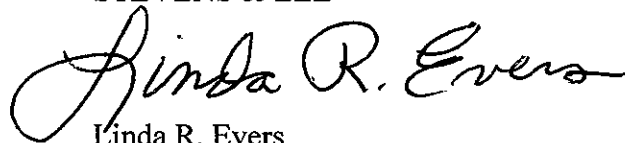
Dear Sir or Madam:

Enclosed for filing please find the original plus three (3) copies of a Motion for Extension of Certificate and Memorandum in Support of Biofuels Technology, LLC. This Motion is being filed contemporaneously with Biofuels Technology's new CRES Application. Upon filing, kindly return a time-stamped copy to me in the enclosed self-addressed stamped envelope.

Thank you, and please feel free to contact me if you have any questions or concerns.

Sincerely,

STEVENS & LEE



Linda R. Evers

Ohio Attorney ID No: 0062554

Encl.

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A PROFESSIONAL CORPORATION

FILE

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of the )  
Application of Biofuels Technology, LLC, ) Case No. 15-1676-EL-AGG  
for its Certification as a Competitive )  
Retail Electric Service Provider to )  
Provide Power Broker Services )

PUCO

2019 NOV -4 AM 11:38

RECEIVED-BOOKING DIV

**MOTION FOR EXTENSION OF CERTIFICATE**

In accordance with Ohio Adm. Code 4901:1-24-04, Biofuels Technology, LLC d/b/a Energy Connection (“Biofuels Technology”) files this motion to request an extension of Certificate No. 15-1018E(2) issued by the Public Utilities Commission of Ohio (“Commission”) in Case No. 15-1676-EL-AGG, which certified Biofuels Technology as Competitive Retail Electric Service (“CRES”) to provide power broker services. For good cause shown, Biofuels Technology respectfully request that the Commission extend Certificate No. 15-1018E(2) to that it will remain in effect up through and including December 24, 2019, or such longer time as the Commission deems necessary to perform its review of Biofuels Technology’s new CRES Certificate Application, which is being filed contemporaneously herewith.

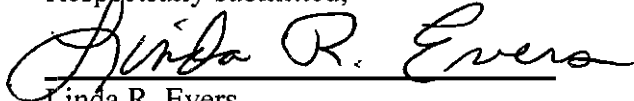
Biofuels Technology’s CRES Renewal Certificate was effective on October 26, 2017 and expired on October 26, 2019. Inadvertently, Biofuels Technology did not file its application for renewal of Certificate No. 15-1018E(2) prior to the Certificate expiration date. Biofuels Technology is therefore filing a new CRES Application pursuant to O.A.C. 4901:1-24-04, which states:

“Any CRES provider or governmental aggregator that fails to file an application for certification renewal pursuant to rule 4901:1-24-09 of the Administrative Code prior to the expiration date on the certificate must file a new application for certification in a new case and may request, no later than sixty days after the expiration date on the certificate, to extend its previous certificate during the pendency of the new application review. If the motion is filed in conformance with rule 4901:1-24-07 or 4901:1-24-13 of

the Administrative Code, it shall be deemed automatically approved unless, within three business days of filing, the commission or an attorney examiner appointed by the commission rules otherwise.”

Biofuels Technology respectfully seeks the grant of its motion for an extension of its current Certificate’s expiration date while the Commission is considering its new application, for the reasons explained herein and in the accompanying memorandum in support.

Respectfully submitted,

A handwritten signature in black ink, reading "Linda R. Evers", written over a horizontal line.

Linda R. Evers

Ohio Attorney ID No: 0062554

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*On behalf of Biofuels Technology, LLC*

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of the )  
Application of Biofuels Technology, LLC, ) Case No. 15-1676-EL-AGG  
for its Certification as a Competitive )  
Retail Electric Service Provider to )  
Provide Power Broker Services )

**MEMORANDUM IN SUPPORT OF MOTION FOR EXTENSION OF CERTIFICATE**

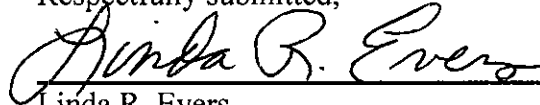
In Case No. 15-1676-EL-AGG, the Commission issued Certificate No. 15-1018E, which certified Biofuels Technology, LLC as a CRES to provide power broker services, effective October 26, 2015. Biofuels Technology then submitted its first renewal application on September 26, 2017, and its renewal Certificate No. 15-1018E(2) was issued by the Commission on October 26, 2015. Unfortunately, due to an inadvertent oversight with regard to the timing for filing, Biofuels Technology did not file its renewal application prior to the expiration of Certificate No. 15-1018E(2). Nevertheless, O.A.C. 4901:1-24-04 affords CRES providers the option to request that their previous certification be extended during the pendency a new application for certification if such request is filed within sixty days of the certificate's expiration which states

“Any CRES provider or governmental aggregator that fails to file an application for certification renewal pursuant to rule 4901:1-24-09 of the Administrative Code prior to the expiration date on the certificate must file a new application for certification in a new case and may request, no later than sixty days after the expiration date on the certificate, to extend its previous certificate during the pendency of the new application review. If the motion is filed in conformance with rule 4901:1-24-07 or 4901:1-24-13 of the Administrative Code, it shall be deemed automatically approved unless, within three business days of filing, the commission or an attorney examiner appointed by the commission rules otherwise.”

Biofuels Technology is filing its new CRES application approximately six (6) days after the expiration date of its prior certificate. Pursuant to O.A.C. 4901:1-24-04, and in order to continue the effectiveness of Biofuels Technology's certificate and to provide the Staff of the Commission with adequate time to review the new Application, Biofuels Technology respectfully requests an extension of its previous CRES provider certificate during the pendency of the new application review (through at least December 24, 2019 or such longer time as the Commission deems necessary to perform its review and avoid any break in the certificate.)

The extension requested herein will not prejudice any party. Biofuels Technology therefore requests that its Motion be granted so that it and its customers do not experience any change or disruption to their service due to the delayed renewal application filing. For these reasons, Biofuels Technology submits that an extension of its certificate expiration date is in the public interest, and it respectfully requests that the Commission grant the extension as set forth herein.

Respectfully submitted,

A handwritten signature in black ink, reading "Linda R. Evers", written over a horizontal line.

Linda R. Evers

Ohio Attorney ID No: 0062554

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*On behalf of Biofuels Technology, LLC*