

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**IN THE MATTER OF NORTH
AMERICAN POWER AND GAS,
LLC'S APPLICATION FOR
RENEWAL OF ITS
CERTIFICATION AS A
COMPETITIVE RETAIL
ELECTRIC SERVICE PROVIDER**

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Case No. 11-5566-EL-CRS

**NORTH AMERICAN POWER AND GAS, LLC'S MOTION TO EXTEND
THE EXPIRATION DATE OF ITS CURRENT COMPETITIVE RETAIL ELECTRIC
SERVICE PROVIDER CERTIFICATE**

North American Power and Gas, LLC (NAPG) respectfully requests that pursuant to OAC § 4901:1-24-09(B), the Public Utilities Commission of Ohio (Commission) extend the term of its competitive retail electric service certificate (No. 11-410E(4)), which is set to expire on November 28, 2019. OAC § 4901:1-24-09(A) and (B) states that retail electric service providers must file a renewal application no less than 30 days prior to the expiration of its certificate or the application must be accompanied by a motion requesting an extension of the certificate. A paper copy of NAPG's renewal application is being overnighted to the Commission contemporaneously with the electronic filing of this motion so that this motion and the application will be filed approximately 2 days before expiration of the certificate. In accordance with OAC § 4901:1-24-09(B), NAPG requests that this motion, which is being filed in conformance with the Commission's rules, be deemed automatically approved.

This motion is further supported by the attached Memorandum In Support. NAPG therefore respectfully requests that its motion be granted.

Respectfully submitted,

/s/ Michael R. Nelson

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November 25, 2019

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**IN THE MATTER OF NORTH
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Case No. 11-5566-EL-CRS

MEMORANDUM IN SUPPORT

North American Power and Gas, LLC (NAPG) was originally granted certification as a retail electric service provider in Ohio on December 1, 2011 (No. 11-410E(1)) and its certificate was most recently renewed in 2017. The current certificate is set to expire on November 28, 2019. OAC § 4901:1-24-09(A) states that retail electric service providers must file a renewal application no less than 30 days prior to the expiration of its certificate. In accordance with OAC § 4901:1-24-09(B), if the renewal application is filed less than 30 days before the expiration of their certificate, electric providers must file a request for extension of the certificate. Accordingly, a paper copy of NAPG's renewal application is being overnighted to the Commission contemporaneously with the electronic filing of this motion so that this motion and the application will be filed approximately two days before expiration of the certificate.

The timing of completion of NAPG's renewal application was due to an administrative oversight. NAPG's requested extension would not harm any potential party to this proceeding and would also ensure that NAPG's customers do not experience any interruption in service or other adverse impact. NAPG will endeavor to timely apply for all future renewals in accordance with OAC § 4901:1-24-09(A).

According to OAC § 4901:1-24-09(B), if a motion for extension of the current certificate is filed in conformance with the Commission's rules, the motion should be deemed automatically

approved. Therefore, NAPG respectfully requests that the Commission extend the term of its certificate as requested herein.

Respectfully submitted,

/s/ Michael R. Nelson

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November 25, 2019

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Case No(s). 11-5566-EL-CRS

Summary: Motion North American Power and Gas, LLC's Motion to Extend the Expiration Date of Its Current Competitive Retail Electric Service Provider Certificate and Memorandum in Support electronically filed by Ms. Sarah K Merrick on behalf of North American Power and Gas, LLC