

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the matter of the Certification Application for)
Electric Governmental Aggregators for Perry) 17-1875-EL-GAG
Township in Columbiana County)

**MOTION OF PERRY TOWNSHIP, COLUMBIANA COUNTY FOR AN
EXTENSION OF THE EXPIRATION DATE OF ITS CERTIFICATE
SUBMITTED BY NORTHEAST OHIO PUBLIC ENERGY COUNCIL**

Pursuant to Ohio Administrative Code (“O.A.C.”) Rule 4901:1-27-4, the Northeast Ohio Public Energy Council on behalf its member community Perry Township, Columbiana County (“Perry Township”) respectfully requests the date for the expiration of its current certification as an electric Governmental Aggregator be extended until a new certificate is granted. The reasons supporting this motion are contained in the attached Memorandum in Support.

Respectfully submitted,



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On behalf of its Member Community Perry Township,
Columbiana County***

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Electric Governmental Aggregators for Perry) 17-1875-EL-GAG
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MEMORANDUM IN SUPPORT

On behalf of its member Perry Township, Columbiana County (“Perry Township”) Northeast Ohio Public Energy Council (“NOPEC”) respectfully requests that the effectiveness of Perry Township’s Competitive Retail Electric Service Provider Certificate Number 17-1262E(1) be extended during the pendency of approval of new application for certification as an electric Governmental Aggregator. Ohio Administrative Code (“O.A.C.”) Rule 4901:1-24-04 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.

Due to an administrative error, Perry Township did not file an application for renewal of its certificate, as O.A.C. Rule 4901:1-24-09(A) would otherwise require. As Perry Township’s current certificate expired on September 29, 2019, and the Public Utilities Commission of Ohio (“Commission” or “PUCO”) has 30 days to review the new application, an extension is necessary to ensure the continuity of certification.

Perry Township contracted with FirstEnergy Solutions Inc. (“FES”) to provide administrative and retail generation supply services for Perry Township’s Aggregation Group, which is comprised of all eligible Ohio Edison Company’s customers located in Perry Township who do not opt-out of the aggregation group.

It is reasonable for the Commission to extend Perry Township’s certification. See, *In the Matter of the Application of Summit Energy Services*, Case No. 13-1175-GA-GAG, Entry, (November 7, 2017) (where the Commission granted applicant's motion for extension of expiration date, although the expiration had already passed 132 days); and *In the Matter of the Application of the City of Norwood*, Case No. 10-390-GA-AGG, Entry, (May 10, 2012) (where the Commission granted applicant's motion for extension of expiration date, although the expiration had already passed). Granting Perry Township’s request for extension of certification expiration date until a new certificate is issued will allow Perry Township to continue to provide its services and avoid the administrative upheaval that could occur if its certification is cancelled.

Perry Township submits that there is no reason or circumstance that warrants suspension or rescission of its certificate. Further, this is Perry Township’s first request for extension of its certificate. See *Summit Energy Services*, Case No. 13-1175-GA-GAG, Entry ¶5 (November 7, 2017) (where the Commission considered whether it was Summit’s first motion for extension of certificate). Perry Township will continue to provide the Commission information as required by the PUCO regarding Perry Township’s activities in Ohio, and Perry Township will continue to comply with all Ohio rules and regulations.

As required by O.A.C. Rule 4901:1-24-04, Perry Township will file a new application for certification in a new case.

NOPEC on the behalf of Perry Township respectfully requests that the Commission extend the current certificate for such timeframe as to allow adequate time for processing of its application.

Respectfully submitted,



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Summary: Motion of Perry Township, Columbiana County for an Extension of The Expiration Date of its Certificate electronically filed by Teresa Orahod on behalf of Devin D. Parram