

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Insight)	
Sourcing Group, LLC for Certification as an)	Case No. 15-1461-EL-AGG
Aggregator/Power Broker in Ohio.)	

MOTION FOR EXTENSION OF A CERTIFICATE

Insight Sourcing Group, LLC (“Insight Sourcing Group”) seeks an extension of Certificate No. 15-1009E (2), which was issued in Case No. 15-1461-EL-AGG and which has authorized Insight Sourcing Group to provide power broker services in Ohio since 2015. Due to an unanticipated emergency, Insight Sourcing Group was not able to file its renewal application on time and its certificate expired on September 19, 2019. Insight Sourcing Group was delayed in filing a new application for certification as a power broker. However, Insight Sourcing Group has filed this same day a new application for certification as a power broker in Case No. 19-2104-EL-AGG. Insight Sourcing Group would like to continue to operate during the pendency of the review of that certificate application. Insight Sourcing Group respectfully requests that Certificate No. 15-1009E(2) be extended from September 19, 2019, until January 2, 2020, or until the date that a new certificate is issued in Case No. 19-2104-EL-AGG.

Additionally, Insight Sourcing Group has filed this motion in conformance with Rule 4901:1-24-07, which requires such motions be filed by an attorney authorized to practice law in Ohio. The undersigned is an Ohio-licensed attorney.

WHEREFORE, Insight Sourcing Group respectfully requests that this motion to extend be approved and that Certificate No. 15-1009E (2) be extended to January 2, 2020, or until a new certificate is issued pursuant to Case No. 19-2104-EL-AGG.

Respectfully submitted,

/s/ Gretchen L. Petrucci

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**MEMORANDUM IN SUPPORT OF
MOTION FOR EXTENSION**

Due to an unanticipated emergency (hospitalization of its sole accountant), Insight Sourcing Group was not able to file an application to renew its Certificate No. 15-1009E (2), which was issued in Case No. 15-1461-EL-AGG. That certificate expired on September 19, 2019. Insight Sourcing Group has now prepared and filed a new certification application in Case No. 19-2104-EL-AGG, including the financial exhibits. Insight Sourcing Group apologizes for the delayed certificate filing, and wishes to continue to operate during the pendency of the review of that certificate application and avoiding any gap in certification. Therefore, Insight Sourcing Group respectfully requests that Certificate No. 15-1009E (2) be extended from September 19, 2019, until January 2, 2020, or until the date that a new certificate is issued in Case No. 19-2104-EL-AGG.

The Commission or an Attorney Examiner may extend a previous certificate while a new application is under review. *See* Ohio Administrative Code Rule 4901:1-24-04. That rule also provides that a motion requesting an extension of a certificate should conform with Rule 4901:1-24-07, which requires that such motions be filed by an attorney authorized to practice law in Ohio. This motion is filed by an Ohio-licensed attorney. Although Insight Sourcing Group has been delayed in seeking the certification and filing this corresponding motion to extend, the delay was due to unanticipated circumstances. There is no harm caused by the requested extension; rather, the extension avoids any gap in its Ohio certification. Insight Sourcing Group has demonstrated good cause for the requested extension. It respectfully requests that the Examiner grant an extension of Certificate No. 15-1009E (2) issued in Case No. 15-1461-EL-

AGG to January 2, 2020, or until such time as a new certificate is issued pursuant to Case No. 19-2104-EL-AGG.

Respectfully submitted,

/s/ Gretchen L. Petrucci

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Summary: Motion Motion for Extension of a Certificate electronically filed by Mrs. Gretchen L. Petrucci on behalf of Insight Sourcing Group, LLC