

FILE



**GREAT  
AMERICAN  
POWER**

February 6, 2020

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

**Re: Renewal Certificate Case Number 18-0083-GA-CRS**

To Whom It May Concern:

Please find Great American Power, LLC ("GAP")'s Renewal Certificate Application. GAP has included here:

- Redacted Application Package
- ✓ • Motion for Extension, and
- **CONFIDENTIAL DOCUMENTS – FILED UNDER SEPARATE SEAL.**

if you have any questions, please do not hesitate to contact me for clarification.

Best regards,

Kari Binns  
General Counsel & Secretary  
Great American Power, LLC  
[kbinns@greatamericanpower.com](mailto:kbinns@greatamericanpower.com)

PUCO

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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of )  
Great American Power, LLC for Certification )  
as a Competitive Retail Natural Gas Marketer )

Case No. 18-0083-GA-CRS

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MOTION FOR EXTENSION

Pursuant to Rule 4901:1-27-09(8) of the Ohio Administrative Code, Great American Power, LLC ("GAP") seeks an extension of Certificate No. 18-641G(1), which was issued in Case No. 18-0083-GA-CRS. The expiration date of Certificate No. 18-641G(1) is February 8, 2020. Due to the inability to obtain one exhibit on a timely basis, GAP did not file its renewal application on time. It has now filed its renewal application on February 6, 2020 which is two calendar days prior to the February 8, 2020 expiration date. GAP respectfully requests that Certificate No. 18-641G(1) be automatically extended from February 8, 2020 until March 6, 2020 or until the date that the new certificate is issued.

WHEREFORE, Great American Power, LLC respectfully requests that Certificate No. No. 18-641 G(1) be automatically extended to March 6, 2020 or until a new certificate is issued and authorize it to continue to operate during the pendency of the renewal application certification review, so that there will be no interruption in service to customers.

Respectfully submitted,

DENTONS COHEN & GRIGSBY P.C.

By:

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Counsel for Great American Power, LLC

## MEMORANDUM IN SUPPORT OF MOTION FOR EXTENSION

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Due to the inability to obtain one exhibit on a timely basis, GAP did not meet the January 8, 2020 filing date for its Renewal Application in Case No. 18-0083-GA-CRS. GAP sincerely apologizes for the delay and assures the Commission that it will timely file renewal applications in the future. GAP emphasizes its desire to continue to serve customers in Ohio.

Rule 4901:1-27-09(B) provides that a motion requesting an extension of a certificate will be deemed automatically approved (unless ruled otherwise by the Commission or an Attorney Examiner within three business days), if a renewal application is filed fewer than thirty calendar days prior to the expiration date of the certificate but no later than the expiration date. GAP submits that it has met the criteria and respectfully requests an automatic extension of the expiration date of Certificate No. 18-641 G(1) issued in Case No. 18-0083-GA-CRS to March 6, 2020 or until such time as a new certificate is issued so as not to interrupt service to customers.

Respectfully submitted,

DENTONS COHEN & GRIGSBY P.C.

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