

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Frontier	)	
Utilities Northeast, LLC for a Certificate to	)	Case No. 14-413-GA-CRS
Provide Competitive Retail Natural Gas	)	
Service in Ohio	)	

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**MOTION FOR EXTENSION**

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Pursuant to Ohio Administrative Code Rule 4901:1-27-09(B), Frontier Utilities Northeast, LLC (“Frontier”) seeks an extension of Certificate No. 14-348G (3), which was issued in Case No. 14-413-GA-CRS. The expiration date of Certificate No. 14-348G (3) is April 29, 2020. Due to the unprecedented work-from-home orders and pressing business issues at Frontier, it was not able to file its renewal application on time. It filed its renewal application on April 1, 2020, which was two business days after the deadline and is prior to the April 29, 2020 certificate expiration date. Frontier respectfully requests that Certificate No. 14-348G (2) be automatically extended from April 29, 2020, until May 1, 2020, or until the date that the renewal certificate is issued.

WHEREFORE, Frontier respectfully requests that Certificate No. 14-348G (3) be automatically extended to May 1, 2020, or until a renewal certificate is issued, and authorize it to continue to operate during the pendency of the renewal application certification review.

Respectfully submitted,

/s/ Gretchen L. Petrucci  
Michael J. Settineri (0073369), Counsel of Record  
Gretchen L. Petrucci (0046608)  
Vorys, Sater, Seymour and Pease LLP  
52 East Gay Street  
Columbus, Ohio 43215  
(614) 464-5462  
[mjsettineri@vorys.com](mailto:mjsettineri@vorys.com)  
[glpetrucci@vorys.com](mailto:glpetrucci@vorys.com)

*Attorneys for Frontier Utilities Northeast, LLC*

**MEMORANDUM IN SUPPORT OF  
MOTION FOR EXTENSION**

Due to the unprecedented work-from-home orders and pressing business issues at Frontier Utilities Northeast, LLC, it did not meet the date for its renewal application in Case No. 14-413-GA-CRS. It filed the renewal application two business days later, on April 1, 2020. Frontier apologizes for this delay.

Ohio Administrative Code 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 30 calendar days prior to the expiration date of the certificate but no later than the expiration date. Frontier submits that it has met this criteria and respectfully requests an automatic extension of the expiration date of Certificate No. 14-348G (3) issued in Case No. 14-413-GA-CRS to May 1, 2020, or until such time as a renewal certificate is issued.

In addition, Frontier notes that the Commission recently ruled in Case No. 20-591-AU-UNC that supplier certification “shall be automatically extended upon filing of a renewal application until or unless otherwise directed by the Commission.” *In the Matter of the Proper Procedures and Process for the Commission’s Operations and Proceedings during the Declared State of Emergency and Related Matters*, Case No. 20-591-AU-UNC, Entry at ¶ 5(b) (March 16, 2020). Frontier

submits that Commission ruling also justifies an automatic extension of its certification, despite Frontier filing its renewal application after the deadline.

Respectfully submitted,

/s/ Gretchen L. Petrucci  
Michael J. Settineri (0073369), Counsel of Record  
Gretchen L. Petrucci (0046608)  
Vorys, Sater, Seymour and Pease LLP  
52 East Gay Street  
Columbus, Ohio 43215  
(614) 464-5462  
[mjsettineri@vorys.com](mailto:mjsettineri@vorys.com)  
[glpetrucci@vorys.com](mailto:glpetrucci@vorys.com)

*Attorneys for Frontier Utilities Northeast, LLC*

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Summary: Motion for Extension electronically filed by Mrs. Gretchen L. Petrucci on behalf of Frontier Utilities Northeast, LLC