

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of  
TriEagle Energy, LP for Certification  
as a Competitive Retail Electric Service  
Supplier

CASE NO.: 14-482-EL-CRS

**TRIEAGLE ENERGY, LP'S MOTION TO EXTEND  
CERTIFICATE NUMBER 14-806E(3)**

TriEagle Energy, LP ("TriEagle") hereby moves under Ohio Adm. Code 4901:1-24-09(B) for an extension of certificate number 14-806E(3). That certificate is currently set to expire on May 7, 2020. Under Ohio Adm. Code 4901:1-24-09(B), any renewal application filed fewer than thirty calendar days prior the expiration date of the certificate "shall be filed with a motion requesting an extension of the certificate." Today, TriEagle filed its renewal application.

Good cause exists to grant this motion. Like virtually all businesses throughout the country, TriEagle has been impacted by the COVID-19 pandemic. In light of the significant administrative challenges for businesses and individual challenges for employees created by the COVID-19 pandemic, TriEagle filed its renewal application as soon as practicable under the circumstances. Additionally, no one will be prejudiced by an extension because TriEagle is currently not marketing to or serving customers in Ohio.

For those reasons, the Commission should grant an extension of certificate number 14-806E(3) until such time as it reaches a decision on TriEagle's renewal application.

Dated: May 6, 2020

Respectfully submitted,

/s David F. Proaño

David F. Proaño (0078838), Counsel of Record

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**TRIEAGLE ENERGY, LP'S MEMORANDUM IN SUPPORT OF ITS MOTION  
TO EXTEND CERTIFICATE NUMBER 14-806E(3)**

TriEagle Energy, LP ("TriEagle") respectfully moves the Public Utilities Commission of Ohio (the "Commission") for an extension of its certification as a Competitive Retail Electricity Service (CRES) provider, number 14-806E(3).

TriEagle has been a licensed CRES provider in Ohio since May 5, 2014, on certificate number 14-806E. TriEagle applied for renewal certificates on April 6, 2016 and April 2, 2018, and renewal certificates were issued on May 10, 2016 and May 7, 2018, respectively.

TriEagle's current certificate is set to expire on May 7, 2020. Concurrently with this motion, TriEagle submitted a renewal application under Ohio Adm. Code 4901:1-24-09. Under Section B of Ohio Adm. Code 4901:1-24-09:

Any renewal application filed fewer than thirty calendar days prior to the expiration date indicated on the certificate, but no later than the expiration date on the certificate, shall be filed with a motion requesting an extension of the certificate.

Because TriEagle's current certificate expires fewer than thirty calendar days after the submission of TriEagle's renewal application, TriEagle respectfully requests that the Commission extend certificate number 14-806E(3).

Good cause exists to grant this motion. The COVID-19 pandemic continues to disrupt the lives of millions of Americans. Ohio Governor Mike DeWine’s “Stay Safe Ohio” order provides that “all individuals currently living in the State of Ohio are ordered to stay at home or in their place of residence” until May 29, 2020.

*Director’s Stay Safe Ohio Order*, April 30, 2020, available at

<https://coronavirus.ohio.gov/static/publicorders/Directors-Stay-Safe-Ohio-Order.pdf>.

Similar orders have been issued by numerous other governors around the country.

During this unique time in our nation’s history, businesses have faced unprecedented challenges. Many employees are working from home—if they are working at all—while homeschooling children, caring for loved ones, and combatting the isolation and stress of the pandemic. Businesses have faced the administrative burden of converting to an online-only workplace in a short time frame.

It was due to this challenging environment that TriEagle did not submit its renewal application within the time frame identified in Ohio Adm. Code 4901:24-09(A), as it did in 2016 and 2018. In light of the many challenges faced by businesses in the COVID-19 era, an extension of TriEagle’s certificate is appropriate and necessary.

No parties in interest will be prejudiced by this motion. TriEagle is not currently serving any customers in Ohio. Furthermore, because the application was submitted prior to the May 7, 2020 expiration, TriEagle will continue to be certified as a CRES provider in Ohio.

In light of the foregoing, TriEagle respectfully requests that the Commission grant an extension of certificate number 14-806E(3).

Dated: May 6, 2020

Respectfully submitted,

/s David F. Proaño

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Summary: Motion TriEagle Energy LP's Motion to Extend Its Certificate electronically filed by Kendall C Kash on behalf of TriEagle Energy LP