

II. MEMORANDUM IN SUPPORT

The Township was granted the authority to provide governmental aggregation services and the current certificate will expire on August 15, 2020. Due the Township's meeting schedule, where renewal applications would be reviewed and signed, the application could not be reviewed in a timely manner. The Township has filed a new application concurrent with this motion. While the Commission considers the new application, the Township requests an extension of the expiration date of its certificate from August 15, 2020(*EXPIRATION DATE*) to September 11, 2020 (*EXPIRATION DATE PLUS 30 DAYS*) , to allow for the thirty day review period from the August 11, 2020 (*DATE OF MOTION FILING*), date of renewal certificate application.

The Township's request for an extension is reasonable under the circumstances and should be granted. If the Commission does not grant this request to extend its certificate under Case No. 16-1577-EL-GAG, the Township's ability to legally provide aggregation services would be in question, this would put the Township's aggregation participants at a disadvantage in that they would not be able to receive the lower electric rates they currently enjoy since they would be potentially forced back to higher priced SSO service. Although a renewal application was not filed within the 30-60 day window as set forth in Rule 4901:1-24-09 (A), in substance there have been no material changes in the Township's operation of its aggregation program as is clear from its new certificate application. The Township has done nothing that would warrant suspension or rescission of its authority. An extension would allow the Township to obtain a new certificate under this case number without causing undue hardship or inconvenience to its participants. The Township respectfully submits that an extension of its certificate expiration date under Case No. 16-1577-EL-GAG is in the public interest.

Wherefore, Energy Harbor on behalf of The Yellow Creek Township respectfully urges the Commission to grant the extension.

Respectfully submitted,

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Case No(s). 16-1577-EL-GAG

Summary: Motion for Extension of Certificate Expiration Date and Memorandum in Support electronically filed by Ty Brocksieker on behalf of Energy Harbor and Yellow Creek Township