

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of the Application)	Case No 10-0851-EL-GAG
of the Radnor Township for Certification)	
As a Governmental Aggregator)	

**MOTION FOR EXTENSION OF CERTIFICATE EXPIRATION DATE AND
MEMORANDUM IN SUPPORT**

I. MOTION FOR EXTENSION

Now comes Energy Harbor. (“EH”) on behalf of The Radnor Township (“the Township”) and moves that the Public Utilities Commission of Ohio (“Commission”) grant an extension of the expiration date of its certificate to provide governmental aggregation services granted by the Commission under Case No. 10-0851-EL-GAG. EH is the current supplier for the Township’s governmental aggregation program. EH routinely assists governmental aggregation communities it serves, like the Township, with making their required renewal filings to the PUCO. Due to the timing of the Township’s meeting, the only opportunity for renewal application to be formally reviewed and signed, EH was unable to obtain signatures for the renewal application from the Township prior to June 19, 2020. As a result of this timing problem a complete renewal application was not submitted within the 30–60 day advance window set forth in rule 4901:1-24-09 of the Ohio Administrative Code (“OAC”). Given that the time for the renewal has passed the Township has filed their application for a renewal certificate concurrent with this motion, and the Township seeks an extension of its current certificate’s expiration during the pendency of the Commission’s considering review of the Township’s application renewal.

II. MEMORANDUM IN SUPPORT

The Township was granted the authority to provide governmental aggregation services and the current certificate will expire on July 20, 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 July 20, 2020(*EXPIRATION DATE*) to September 25, 2020 (*EXPIRATION DATE PLUS 30 DAYS*) , to allow for the thirty day review period from the August 26, 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. 10-0851-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. 10-0851-EL-GAG is in the public interest.

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

Respectfully submitted,

/s/ N. Trevor Alexander
N. TREVOR ALEXANDER (0080713)
41 S. High St.
1200 Huntington Center
Columbus, Ohio 43215
Telephone: (614) 621-1500
Fax: (614) 621-0010
talexander@calfee.com

On behalf of Energy Harbor.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

8/26/2020 3:20:56 PM

in

Case No(s). 10-0851-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 Radnor Township