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November 23, 2020

VIA ELECTRONIC FILING

Public Utilities Commission of Ohio Docketing Division 180 E. Broad Street Columbus, Ohio 43215

> Re: In the matter of the Renewal Certification Application Ohio Natural Gas Governmental Aggregators for the City of Marion Case No. 02-1771-GA-GAG

Dear Sir/Madam:

Please see the attached Motion for Extension of Certification Expiration Date to be filed in the above matter.

Very truly yours,

VOLUNTEER ENERGY SERVICES, INC.

/s/ John L. Einstein, IV, Esq.

John L. Einstein, IV, Esq.

BEFORE THE PUBLIC UTILITIES COMMISSIONS OF OHIO

In the Matter of the Application for the City of : Marion for Renewal of Certification as a : Governmental Aggregator. :

Case No. 02-1771-GA-GAG

MOTION FOR EXTENSION OF CERTIFICATION EXPIRATION DATE

:

Pursuant to Section 4901:1-27-09 <u>Ohio Admin. Code</u>, the City of Marion (the "City") respectfully requests that the Public Utilities Commission of Ohio ("PUCO" or "Commission") grant its Motion for Extension of Certification Expiration Date for Renewal of Certification as a Governmental Aggregator for the reasons set forth in the attached Memorandum in Support. The City of Marion seeks an extension of time of its current certification until January 23, 2021.

Respectfully submitted,

By: <u>/s/ John L. Einstein, IV</u> John L. Einstein, IV (0072069) jeinstein@volunteerenergy.com 790 Windmiller Drive Pickerington, Ohio 43147 Phone: 614-729-2325 Fax: 614-729-2326 *Attorney for the City of Marion*

MEMORANDUM IN SUPPORT

Do to an oversight arising out of remote working along with other obstacles created by the COVID-19 pandemic, the City did not file an application for renewal within the thirty (30) day advance window set forth in Section 4901:1-27-09 <u>Ohio Admin. Code.</u> The City will be filing a Renewal Certification Application as a Governmental Aggregator pursuant to Section 4901:1-27-04 <u>Ohio Admin. Code</u>. During the pendency of the new application review, the City requests the previous certificate be extended for sixty (60) days from the date of this filing to January 23, 2021.

The City of Marion maintains that this extension will not prejudice any party. There have been no material changes in the City's operation of its aggregation program. Extension of the expiration date is necessary to prevent irreparable harm to the City and its residents, and would prevent disruption in service to the City's participants.

Wherefore, the City of Marion respectfully requests that the Commission grant its Motion for Extension of Certification Expiration Date.

Respectfully submitted,

By: <u>/s/ John L. Einstein, IV</u> John L. Einstein, IV (0072069) jeinstein@volunteerenergy.com 790 Windmiller Drive Pickerington, Ohio 43147 Phone: 614-729-2325 Fax: 614-729-2326 *Attorney for the City of Marion* This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 02-1771-GA-GAG

Summary: Motion for Extension of Certification Expiration Date electronically filed by Mr. John L Einstein IV, Esq. on behalf of City of Marion