

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application for EDF)	Case No. 18-1536-GA-CRS
Energy Services, LLC for Certification as a)	
Competitive Retail Natural Gas Supplier)	
)	

MOTION OF EDF ENERGY SERVICES, LLC TO EXTEND ITS
COMPETITIVE RETAIL NATURAL GAS PROVIDER CERTIFICATION

EDF Energy Services, LLC (“EDF Energy”) hereby respectfully moves the Public Utilities Commission of Ohio for an extension of its Competitive Retail Natural Gas Service (CRNGS) certification, 18-680G(1), until such time as the Commission has ruled on EDF Energy’s CRNGS renewal application. On November 12, 2020, EDF Energy’s certification expired, but due to an administrative oversight exacerbated by the current remote work environment, EDF Energy did not file a renewal application within the time period prescribed by Ohio Adm.Code 4901:1-24-09. The renewal application was filed today, together with the filing of this motion.

An extension is necessary to permit EDF Energy to continue to serve its customers while the Commission considers the renewal application. The reasons supporting this motion are more fully set forth in the attached memorandum in support.

Dated: January 28, 2021

Respectfully submitted,

/s/ David F. Proaño

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Energy Services, LLC for Certification as a)	
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MEMORANDUM IN SUPPORT OF THE MOTION OF
EDF ENERGY SERVICES, LLC TO EXTEND ITS COMPETITIVE
RETAIL NATURAL GAS PROVIDER CERTIFICATION

EDF Energy Services, LLC (“EDF Energy”) is a certified competitive retail natural gas provider in Ohio with Certification No. 18-680G(1), Case No. 18-1536-GA-CRS.¹ On November 12, 2020, EDF Energy’s certification expired. Contemporaneous with this motion, EDF Energy filed a renewal application for a CRNGS certification. Under Ohio Adm.Code 4901:1-24-04, a CRNGS supplier with an expired certification may file a motion for extension of its prior certification until the Commission rules on the new application.

There is good cause to grant this motion. EDF Energy continues to provide CRNGS services in Ohio. EDF Energy only serves large commercial and industrial customers in Ohio. An extension would provide those customers continuity of service while the renewal application remains pending. There have been no material changes at EDF Energy, and as demonstrated by the contents of its renewal application, EDF Energy has the managerial, technical and financial capability to continue providing CRNGS services in Ohio.

Moreover, the failure to timely file a renewal application was due to an administrative oversight compounded by the current remote work environment caused by the global pandemic. After EDF Energy was issued its current certification in 2018, it migrated the data used for

¹ Prior to this case, EDF Energy held Certification No. 16-535G in Case No.16-1540-GA-CRS.

regulatory reporting and licensing renewals to a new automated tracking system. Unfortunately, during that migration process, the information regarding the expiration date for EDF Energy's current CRNGS certification was not migrated into the new tracking system. EDF Energy is investigating why that migration did not occur, but it appears to be a simple error isolated to its Ohio CRNGS certification information, since the tracking information relating to EDF Energy's Ohio CRES certification was successfully migrated into the new tracking system. Part of the reason EDF Energy did not discover this error and the missed deadline earlier was due to the challenges posed by the current work-at-home policies instituted to protect its employees during this unprecedented global COVID-19 pandemic. EDF Energy believes the error would have been discovered earlier with the in-person contact that is a routine part of business during normal working conditions.

EDF Energy regrets that it missed this CRNGS certification renewal deadline, and respectfully submits it was entirely unintentional and due solely to an error in the data migration to EDF Energy's new regulatory tracking system. EDF Energy is putting into a place a specific program to ensure deadlines are adhered to in the future. Specifically, twice in every calendar year EDF Energy will manually audit the information in its regulatory and licensing tracking system to ensure the information regarding filing and license deadlines is complete and accurate.

For these reasons, granting this extension will not prejudice any parties. EDF Energy is owned by a world-leading energy company, and it has the financial ability, managerial experience and technical capability to meet all of its obligations and continue to provide competitive natural gas services to Ohio customers. Further, EDF Energy does not serve residential or small commercial customers in Ohio, lessening significantly any risk of confusing or other issues that may be created by an untimely certification application.

For the foregoing reasons, EDF Energy respectfully submits that the Commission should grant an extension of its CRNGS certification in this matter until such time as the Commission rules on the pending renewal application.

Dated: January 29, 2021

Respectfully submitted,

/s David F. Proaño

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Summary: Motion to Extend EDF Energy's CRNGS Certificate electronically filed by Mr. David F. Proano on behalf of EDF Energy Services LLC