



under this section, the extension lasts for the duration of the new application review. The portions of these rules addressing the duration of the extension are waived for the purpose of more specifically defining the length of extension allowed. Now, a CRES/CRNGS provider may request, no later than 60 days after the expiration date on the certificate, to extend its previous certificate *for up to 90 days* while the new application is reviewed.

*Entry, In the Matter of the Commission's Consideration of a New Electronic Certification Processing System for Providers of Competitive Retail Electric Service and Competitive Retail Natural Gas Service and the Waiver of Applicable Procedural Rules Contained in Ohio Adm.Code Chapters 4901:1-24 and 4901:1-27, ¶ 6(a) (emphasis in original).*

Consistent with the Commission's Entry, Dynegy respectfully requests that the Commission grant an extension of the Village's certificate until June 25, 2021, or for such longer period the Commission deems appropriate, to cover the duration of the thirty-day review period for the Village's renewal application, which is being filed concurrently with this motion. *See* Ohio Adm.Code 4901:1-24-10(A) ("If the commission does not act upon an application for certification or certification renewal within thirty days of the filing date, the application shall be deemed automatically approved pursuant to section 4928.08 of the Revised Code on the thirty first day after the official filing date."). Dynegy notes that less than sixty days have passed since the expiration of the Village's certificate, and that the Commission's Entry authorizes extension of the Village's prior certificate for up to ninety days from the date of expiration (through August 3, 2021). Therefore, the requested extension is within the boundaries set by the Commission's Entry.

There have been no material changes to the operation of the Village of Wellsville's governmental aggregation program, and the Village has done nothing that would warrant suspension or rescission of its authority to serve as a governmental aggregator, but for the untimely filing of a renewal application. The requested extension will permit the Village to

obtain a certificate renewal under this case number and avoid undue hardship to the Village and to Village residents participating in the aggregation program. Thus, Dynegy respectfully submits that the requested extension is reasonable and in the public interest and should be granted.

Dated: May 26, 2021

Respectfully submitted,

/s/ David F. Proaño

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Summary: Motion for Extension of Certificate Expiration Date electronically filed by Mr. David F. Proano on behalf of Dynegy Energy Services (East), LLC