

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	Case No. 17-2122-GA-CRS
Mpower Energy NJ LLC for Renewal of)	
its Certification as a Competitive Retail)	
Natural Gas Marketer)	
)	
In the Matter of the Application of)	Case No. 19-2095-EL-CRS
Mpower Energy NJ LLC for Certification)	
as a Competitive Retail Electric Service)	
Provider)	
)	

**MPOWER ENERGY NJ LLC'S
MOTION FOR EXTENSION**

Mpower Energy NJ LLC ("Mpower") is a certified Ohio Competitive Retail Natural Gas Marketer under certification Case No. 17-2122-GA-CRS and a certified Competitive Retail Electric Service Provider under certification Case No. 19-2095-EL-CRS (collectively, the "certificates"). The end date for Mpower's most recent Ohio Competitive Retail Natural Gas Marketer Certificate was December 27, 2021, and the end date for Mpower's Competitive Retail Electric Service Provider Certificate was December 28, 2021. Mpower will be filing its applications to renew both of these certificates forthwith. Mpower now brings this motion for an extension pursuant to Rules 4901:1-24-04 and 4901:1-24-10 (electric) and 4901:1-27-04 and 4901:1-27-10 (gas), as well as the Commission's June 3, 2020 Entry in Case No. 20-1077-GE-WVR.

As set forth more fully in the attached memorandum in support, Mpower respectfully seeks: (i) an extension of its current certificates during the pendency of the new application review; and (ii) the authority to operate during the pendency of the pending certification applications.

Respectfully submitted,

/s/ James F. Lang

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**MEMORANDUM IN SUPPORT OF
MPOWER ENERGY NJ LLC'S
MOTION FOR EXTENSION OF CERTIFICATES**

Mpower Energy NJ LLC ("Mpower") is a company engaged in the retail sale of electricity and natural gas to residential and commercial customers throughout the United States. Mpower's Ohio Competitive Retail Natural Gas ("CRNG") marketer certificate was issued in Case No. 17-2122-GA-CRS and its Competitive Retail Electric Service ("CRES") provider certificate was issued in 19-2095-EL-CRS (collectively, the "certificates").

Rule 4901:1-24-09 requires CRES renewal applications to be filed no less than thirty and no more than sixty days prior to the certificate expiration date. If an application for renewal is not filed prior to the expiration date on the certificate, the CRES provider may file a new application and also may request to extend its previous certificate during the pendency of the new application review. O.A.C. 4901:1-24-04.¹ The same process is available for CRNG marketers. O.A.C. 4901:1-27-04, -09. The expiration date for Mpower's CNRG marketer certificate was December 27, 2021 and for its CRES provider certificate was December 28, 2021. The Commission has

¹ In its June 3, 2020 Entry in Case No. 20-1077-GE-WVR, the Commission waived the requirement to file a renewal application in a new case.

thirty days to act on an application to renew a certification. O.A.C. 4901:1-24-10 and O.A.C. 4901:1-27-10.

Due to Covid-19 effects on staffing, Mpower is now filing its applications to renew each of these certificates forthwith. In order to facilitate the proper renewals, and to ensure that Mpower will be able to service its customers in Ohio during the pendency of the applications, Mpower respectfully requests: (i) an extension of its current certificates during the pendency of the new application review; and (ii) the authority to operate during the pendency of the pending certification applications.

Respectfully submitted,

/s/ James F. Lang

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CERTIFICATE OF SERVICE

I certify that the foregoing was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 5th day of January 2022.

/s/ Gretchen L. Whaling
*One of the Attorneys for Mpower Energy NJ
LLC*

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

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in

Case No(s). 17-2122-GA-CRS, 19-2095-EL-CRS

Summary: Motion for Extension and Memorandum in Support electronically filed by
Ms. Gretchen L Whaling on behalf of Mpower Energy NJ LLC