

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's)	
Investigation into RPA Energy, Inc.'s)	
Compliance with the Ohio Administrative)	
Code and Potential Remedial Actions for)	Docket 22-441-GE-COI
Non-Compliance.)	
)	

**RPA ENERGY, INC. D/B/A GREEN CHOICE ENERGY'S
MOTION TO TEMPORARILY SUSPEND THE PROCEDURAL SCHEDULE**

(Expedited Ruling Requested)

Under Rule 4901-1-12(A), RPA Energy, Inc. d/b/a Green Choice Energy (the Company) respectfully requests issuance of an Entry: (a) suspending the current procedural schedule; and (b) scheduling a prehearing conference as soon as practicable to establish a new schedule. "Good cause" exists to grant this relief, and in accordance with Rule 4901-1-12(C), undersigned counsel certifies that all other parties of record have been contacted to determine if any party objects to an immediate ruling without the filing of memoranda. The undersigned certifies that Office of Consumers' Counsel (OCC) does not object but that counsel for Staff has not responded.

MEMORANDUM IN SUPPORT

The current schedule requires direct testimony to be filed on September 21, 2022. The Company planned to file testimony by its President, Mr. Brian Trombino. Unfortunately, Mr. Trombino's father suffered an unexpected medical emergency on or around September 4 and died on September 14. These circumstances have prevented the Company and its counsel from making the progress necessary to meet a September 21 filing deadline.

Undersigned counsel has not pestered Mr. Trombino about the exact date of funeral arrangements or when he will be able to turn his attention back to this case. Counsel's current best guess is that an extension of approximately two weeks should be sufficient. A shorter extension that maintains the October 5, 2022 hearing date may also be possible. The Company does not wish to delay this proceeding any longer than necessary and assumes that other parties share this wish. The Company requests that a prehearing conference be scheduled to address all parties' options and preferences.

In accordance with Rule 4901-1-12(C), undersigned counsel certifies that counsel for all parties of record have been notified of this motion. The undersigned certifies that counsel for Staff has not responded (in Staff's defense, this motion was first circulated late this morning) but that counsel for OCC has indicated no objection to an immediate ruling.

Dated: September 16, 2022

Respectfully submitted,

/s/ Mark A. Whitt

Mark A. Whitt (0067996)

WHITT STURTEVANT LLP

88 East Broad Street, Suite 1590

Columbus, Ohio 43215

Telephone: (614) 224-3912

whitt@whitt-sturtevant.com

Attorney for RPA Energy, Inc.

d/b/a Green Choice Energy

CERTIFICATE OF SERVICE

I hereby certify that a courtesy copy of the foregoing pleading was served by electronic mail upon the following individuals on September 16, 2022:

angela.obrien@occ.ohio.gov
ambrosia.wilson@occ.ohio.gov
Robert.Eubanks@OhioAGO.gov
Rhiannon.Plant@OhioAGO.gov

Attorney Examiners:
Jesse.davis@puco.ohio.gov

/s/ Mark A. Whitt
One of the Attorneys for *RPA Energy, Inc.*
d/b/a Green Choice Energy

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Summary: Motion Motion to Temporarily Suspend The Procedural Schedule
electronically filed by Ms. Valerie A. Cahill on behalf of RPA Energy Inc., d/b/a
Green Choice Energy