

In the Matter of the Application of the )  
 Village of Metamora for Certification as a ) Case No. 12-1291-EL-GAG  
 CRES Governmental Aggregator )

Now comes Dynegy Energy Services (East), LLC (“Dynegy”), by and through counsel, on behalf of the Village of Metamora, and respectfully moves that the Public Utilities Commission of Ohio (“Commission”) extend the expiration date of the Village’s certificate to provide governmental aggregation services (Case No. 12-1291-EL-GAG; Certificate 12-516E) for the duration of the review of the renewal application.

Ohio Adm.Code 4901:1-24-04 and Ohio Adm.Code 4901:1-27-04 are waived to the extent that a CRES/CRNGS provider, when failing to file a certification renewal application prior to the expiration of the existing certificate, must now file a certification renewal application under the existing certification case number instead of filing it in a new case. Additionally, if a CRES/CRNGS provider currently requests an extension of the previous certificate 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).

Dynegy respectfully requests that the Commission grant an extension of the Village's certificate for the duration of the 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.").

There have been no material changes to the operation of the Village'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: April 3, 2024

Respectfully submitted,

/s/ David F. Proaño

David F. Proaño (0078838)

[dproano@bakerlaw.com](mailto:dproano@bakerlaw.com)

Taylor M. Thompson (0098113)

[tathompson@bakerlaw.com](mailto:tathompson@bakerlaw.com)

BAKER & HOSTETLER LLP

Key Tower  
127 Public Square, Suite 2000  
Cleveland, Ohio 44114  
Phone: 216-621-0200  
Fax: 216-696-0740

*Counsel for Dynegy Energy Services (East), LLC*

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

**4/3/2024 4:22:31 PM**

**in**

**Case No(s). 12-1291-EL-GAG**

Summary: Motion for Extension of Certificate of Village of Metamora as CRES  
Governmental Aggregator electronically filed by Mr. Taylor M. Thompson on behalf  
of Dynegy Energy Services (East), LLC .