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BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO

2008 AUG 22 PM 4:37

In the Matter of the Application of Ohio  
Edison Company, The Cleveland  
Illuminating Company, and the Toledo  
Edison Company, for Authority to Establish  
a Standard Service Offer Pursuant to R.C.  
4928.143 in the Form of an Electric Security  
Plan.

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PUCO

Case No. 08-935-EL-SSO

Case No. 08-936-EL-SSO

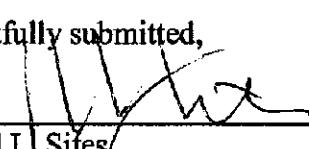
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**MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT  
OF OHIO HOSPITAL ASSOCIATION**

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Pursuant to section 4903.221 of the Ohio Revised Code and section 4901-1-11 of the Ohio Administrative Code, the Ohio Hospital Association ("OHA") moves for leave to intervene in these proceedings. The Public Utilities Commission of Ohio ("Commission") should grant OHA leave to intervene because OHA has a real and substantial interest in these proceedings and the Commission's disposition of the cases may adversely affect OHA's interest.

Respectfully submitted,

  
\_\_\_\_\_  
Richard L. Sites  
General Counsel and Senior Director of  
Health Policy  
Ohio Hospital Association  
155 East Broad Street, 15<sup>th</sup> Floor  
Columbus, OH 43215-3620  
Phone: (614) 221-7614  
Fax: (614) 221-4771  
Email: ricks@ohanet.org

**COUNSEL FOR OHIO HOSPITAL  
ASSOCIATION**

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**MEMORANDUM IN SUPPORT OF OHIO HOSPITAL ASSOCIATION  
MOTION TO INTERVENE**

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The Ohio Hospital Association ("OHA") should be permitted to intervene in the above-captioned proceedings because it has real and substantial interests. OHA was actively involved in the recent legislative process that resulted in enactment of Senate Bill 221, and has intervened since 2000 in various cases involving Ohio's electric utilities before the Public Utilities Commission of Ohio ("Commission"). The 178 hospitals and 40 healthcare system members of OHA have more than 700 electricity accounts statewide and annually spend well in excess of \$150 million for electric services. A significant amount of that expenditure is for electric service provided by the Ohio Edison Company, the Cleveland Illuminating Company, and the Toledo Edison Company ("Companies") to the approximately 90 hospitals in their service areas. Every hospital, or virtually every hospital, in the Companies' service areas are members of OHA and a list of all OHA member hospitals is posted at [www.ohanet.org/about\\_oha/member\\_list.asp](http://www.ohanet.org/about_oha/member_list.asp).

OHA is concerned that the ultimate resolution of the matters to be addressed in the above-captioned proceedings could have a substantial effect on the electricity costs of OHA

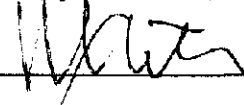
members, including the hospitals in the service areas of the Companies, as well as hospital interests in power reliability, adequacy, and demand management. A significant component of hospital costs is electricity, estimated at about \$4500 per staffed bed per annum, and such cost is necessarily passed on to patients, their families, businesses and taxpayers. Additionally, hospitals have somewhat unique electricity load patterns and require reliable electric service on a 24-hour basis every day of the year in order to provide medical care. Pertinent to these proceedings is the additional fact that all hospitals are required by federal regulators and accrediting organizations to maintain emergency generators in the event of interrupted utility power, and larger hospitals in particular utilize sophisticated energy management systems and related energy efficiency technology. In sum, communities and individuals depend upon hospitals, hospitals in turn depend upon electric companies to provide reliable service at an affordable rate, and hospitals and the Companies have a common interest in matters related to energy efficiency and demand management.

As a result of the above-stated concerns, OHA has a substantial interest in these proceedings that is not adequately addressed by any other party. OHA's participation in these cases, similar to its participation in previous cases involving the Companies, will enhance the effectiveness of the proceedings, will not unnecessarily cause delay, and will better ensure that the proceedings in this matter are fair to Ohio hospitals.

Accordingly, OHA respectfully requests that the Commission determine that it has a real and substantial interest in the proceedings which could be adversely affected by the outcome, and therefore should grant OHA's Motion to Intervene pursuant to §4903.221 of the Ohio

Revised Code and §4901-1-11 of the Ohio Administrative Code.

Respectfully submitted,



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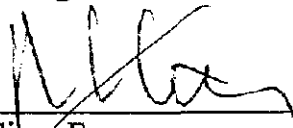
Richard L. Sites  
General Counsel and Senior Director of  
Health Policy  
Ohio Hospital Association  
155 East Broad Street, 15<sup>th</sup> Floor  
Columbus, OH 43215-3620  
Phone: (614) 221-7614  
Fax: (614) 221-4771  
Email: ricks@ohanet.org

**COUNSEL FOR OHIO HOSPITAL  
ASSOCIATION**

August 22, 2008

## **CERTIFICATE OF SERVICE**

This is to certify that a copy of the Ohio Hospital Association's Motion to Intervene and Memorandum in Support was served upon the interested parties listed below electronically or by first class U. S. mail, postage prepaid, on this 22nd day of August 2008.

  
\_\_\_\_\_  
Richard L. Sites, Esq.

JAMES W. BURK  
ARTHUR E. KORKOSZ  
EBONY L. MILLER  
FIRSTENERGY  
76 SOUTH MAIN STREET  
AKRON, OH 44308-1890

DAVID BOEHM  
MICHAEL KURTZ  
BOEHM, KURTZ & LOWRY  
36 EAST SEVENTH STREET SUITE 1510  
CINCINNATI, OH 45202-4454

M. HOWARD PETRICOFF  
STEPHEN M. HOWARD  
VORYS, SATER, SEYMOUR AND PEASE  
52 EAST GAY STREET  
P.O. BOX 1008  
COLUMBUS, OH 43216-1008

MATTHEW S. WHITE  
JOHN W. BENTINE  
MARK S. YURICK  
CHESTER, WILCOX & SAXBE, LLP  
65 EAST STATE STREET, SUITE 1000  
COLUMBUS, OH 43215

JANINE L. MIGDEN-OSTRANDER  
JEFFREY SMALL  
JACQUELINE LAKE ROBERTS  
RICHARD C. REESE  
GREGORY J. POULOS  
OFFICE OF OHIO CONSUMERS'  
COUNSEL  
10 W. BROAD STREET SUITE 1800  
COLUMBUS, OH 43215

SAMUEL C. RANDAZZO  
JOSEPH M. CLARK  
LISA G. MCALISTER  
DANIEL J. NEILSEN  
MCNEES WALLACE & NURICK LLC  
21 EAST STATE STREET 17<sup>TH</sup> FLOOR  
COLUMBUS, OH 432315

DAVID C. RINEBOLT  
231 WEST LIMA ST., PO BOX 1793  
FINDLAY, OH 45839-1793

BARTH ROYER  
BELL & ROYER CO., LPA  
33 SOUTH GRANT AVENUE  
COLUMBUS, OH 43215-3927

GARRETT A. STONE  
MICHAEL K. LAVANGA  
BRICKFIELD, BURCHETTE, RITTS &  
STONE, P.C.  
1025 THOMAS JEFFERSON STREET, N.W.  
8<sup>TH</sup> FLOOR, WEST TOWER  
WASHINGTON, D.C. 20007

CONSTELLATION ENERGY  
COMMODITIES GROUP, INC.  
JOHN ORR, VP REGULATORY AFFAIRS  
111 MARKET PLACE, 5<sup>TH</sup> FL  
BALTIMORE, MD 21202

LESLIE A. KOVACIK  
SENIOR ATTORNEY, CITY OF TOLEDO  
420 MADISON AVE., SUITE 100  
TOLEDO, OH 4360-1219

LANCE M. KEIFFER  
ASSISTANT PROSECUTING ATTORNEY  
711 ADAMS STREET, 2<sup>ND</sup> FLOOR  
TOLEDO, OH 43624-1680

SHEILAH MCADAMS  
CITY OF MAUMEE  
204 W. WAYNE STREET  
MAUMEE, OH 43537

BRIAN BALLENGER  
BALLENGER & MOORE CO., LPA  
3401 WODDVILLE ROAD, SUITE C  
TOLEDO, OH 43619

PAUL GOLDBERG  
CITY OF OREGON  
5330 SEAMAN RD  
OREGON, OH 43616

JAMES E. MOAN  
CITY OF SYLVANIA  
4930 HOLLAND-SYLVANIA ROAD  
SYLVANIA, OH 43560

PAUL SKAFF  
VILLAGE OF HOLLAND  
353 ELM STREET  
PERRYSBURG, OH 43551

THOMAS HAYS, SOLICITOR  
LAKE TOWNSHIP  
3315 CENTENNIAL RD., SUITE A-2  
SYLVANIA, OH 43560

CYNTHIA A. FONNER  
CONSTELLATION ENERGY GROUP, INC.  
550 W. WASHINGTON ST. SUITE 300  
CHICAGO, IL 60661