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Case No. 08-918-EL-SSO

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Ohio Hospital Association

October 31, 2008

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1 **BACKGROUND, EXPERIENCE AND PURPOSE**

2
3 1. Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

4
5 A. My Name is Peter B. Fleming. My business address is 3705 Olentangy River
6 Road, Lower Level, Columbus, OH 43214.
7

8 2. Q. BY WHOM ARE YOU EMPLOYED?
9

10 A. I am employed by OhioHealth, a regional not-for-profit healthcare organization
11 that includes Riverside Methodist Hospital, Grant Medical Center, Doctors
12 Hospital, Grady Memorial Hospital, Dublin Methodist Hospital,
13 Doctors Hospital – Nelsonville, Hardin Memorial Hospital and Marion General
14 Hospital.
15

16 3. Q. WHAT IS YOUR POSITION WITH OHIOHEALTH?
17

18 A. My title is System Vice President, Real Estate and Construction.
19

20 4. Q. HOW LONG HAVE YOU HELD THIS POSITION?
21

22 A. I have held this position for three years.
23

24 5. Q. WHAT IS THE NATURE OF YOUR DUTIES WITH OHIOHEALTH?
25

26 A. I am responsible for all real estate activities in Central Ohio of the 6,500,000
27 square feet that we control. This includes development and partnership activities,
28 acquisition and disposition, design, renovation and construction and property
29 management of all OhioHealth properties. My responsibilities include ensuring
30 that these facilities have a dependable, high quality supply of electricity, both from
31 the local electric utility grid, as well as on-site backup generation. The facilities
32 operated by OhioHealth range from the main campuses of the hospitals and
33 medical centers listed above, to smaller office spaces in local neighborhoods and
34 smaller special-purpose facilities. I will refer to the hospital and medical center
35 buildings as our "major facilities."
36

37 6. Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.
38

39 A. I have a bachelor's degree from Western Michigan University.
40

41 7. Q. ARE YOU FAMILIAR WITH AEP's APPLICATION IN THIS CASE?
42

43 A. Only in a general sense. I am aware that AEP is proposing to increase its rates for
44 electric service by approximately 45% over the next three years, based on the

1 reports contained in the local media. I am also aware that AEP is requesting a
2 new rate structure for its alternate feed service.
3

4 **8. Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS CASE?**

5
6 **A.** OhioHealth is an active participant in the Ohio Hospital Association (OHA). I
7 have been asked by counsel for OHA to provide testimony in this case describing
8 the importance of dependable, high-quality electricity to the operation of
9 OhioHealth's facilities and the particular characteristics of the hospitals as
10 consumers of electricity.
11

12 **INFORMATION ABOUT OHIOHEALTH**
13

14 **9. Q. HOW MANY PEOPLE ARE EMPLOYED BY OHIOHEALTH?**

15
16 **A.** OhioHealth has approximately 15,300 associates of which 12,800 are in Central
17 Ohio. The Real Estate Department has about 175 people.
18

19 **10. Q. PLEASE DESCRIBE THE CHARACTERISTICS OF OHIOHEALTH'S**
20 **FACILITIES AS CONSUMERS OF ELECTRICITY.**
21

22 **A.** Our major facilities operate around the clock, 365 days of the year. The most
23 important characteristic of our major facilities is the fact that they must have a
24 supply of electricity, either from the local utility, or from on-site generation
25 facilities. This is required of any healthcare facility that provides any overnight
26 services, provides surgical facilities, or provides care to non-ambulatory patients.
27 These requirements are contained in the NFPA Life Safety Code 1.1, as well as in
28 portions of the National Electric Code.
29

30 In addition to maintaining on-site standby generating facilities, our major facilities
31 also employ redundant electrical feeds from the local distribution grid. These
32 redundant service feeds provide a higher level of dependability from the local
33 distribution system, as service can be maintained if the local circuit serving any
34 particular feed is disrupted.
35

36 **11. Q. HOW MUCH ELECTRICITY IS CONSUMED BY OHIOHEALTH'S**
37 **FACILITIES EACH YEAR?**
38

39 **A.** OhioHealth will have consumed approximately 537,590,360 kWh of electricity in
40 2008, costing OhioHealth approximately \$8,601,446.
41

1 12. Q. PLEASE DESCRIBE THE IMPORTANCE OF ELECTRICITY TO THE
2 OPERATION OF THE OHIOHEALTH FACILITIES.
3

4 A. OhioHealth plans to have around 100,000 inpatient admissions and over
5 2,200,000 outpatient and emergency visits in 2009. Each of these patients' health,
6 and even life, would be at greater risk with disrupted or unavailable electricity.
7 From the lighting, heating and cooling of the facilities, to the high technology
8 diagnostic and treatment equipment that are used to treat these patients, electricity
9 is integral to the services that we provide.
10

11 13. Q. DOES THIS CONCLUDE YOUR TESTIMONY?
12

13 A. Yes it does.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing DIRECT TESTIMONY OF PETER

B. FLEMING was served via electronic mail upon the following, this 31st day of October 2008.


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