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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Dayton Power & Light Company for Approval of an Electric Security Plan. ) Case No. 08-1094-EL-SSO

In the Matter of the Application of Dayton Power & Light Company for Approval Revised Tariffs. ) Case No. 08-1095-EL-ATA

In the Matter of the Application of Dayton Power & Light Company for Approval of Certain Accounting Authority Pursuant to Section 4905.13, Revised Code. ) Case No. 08-1096-EL-AAM

In the Matter of the Application of Dayton Power & Light Company, for Approval of Amended Corporate Separation Plan. ) Case No. 08-1097-EL-UNC

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MOTION TO INTERVENE OF THE OHIO HOSPITAL ASSOCIATION

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Pursuant to §4903.221 of the Ohio Revised Code and Rule 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 these proceedings may impair or impede OHA's ability to protect that interest.

Respectfully submitted on behalf of  
OHIO HOSPITAL ASSOCIATION

  
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**MEMORANDUM IN SUPPORT OF OHIO HOSPITAL ASSOCIATION'S  
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 been granted intervention in the standard service offering ("SSO") proceedings 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 service provided by Dayton Power & Light Company ("DP&L") to the approximately 21 hospitals in its service area. Every hospital, or virtually every hospital, in DP&L's service area is a member of OHA and all OHA member hospitals are 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 area of DP&L, as well as hospital interests in power reliability, adequacy, and demand management. A significant component of hospital costs is electric, estimated at about \$4500 per staffed bed per annum, and such costs are 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 DP&L have a common interest in matters related to energy efficiency and demand management.

As a result of the above concerns and hospital characteristics, OHA has a substantial interest in these proceedings that is not adequately addressed by any other party. OHA's participation will enhance the effectiveness of the above proceedings, will not unnecessarily cause delay, and will help ensure that the proceedings in this matter are fair to its membership.

Accordingly, OHA respectfully requests the Commission to determine that OHA has a real and substantial interest in these proceedings and should grant its Motion to Intervene pursuant to §4903.221 of the Ohio Revised Code and Rule 4901-1-11 of the Ohio Administrative Code.

Respectfully submitted on behalf of  
OHIO HOSPITAL ASSOCIATION




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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 2nd day of December 2008 via electronic or first class mail.

  
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