

**BEFORE  
THE PUBLIC UTILITY COMMISSION OF OHIO**

In the Matter of the Application of Ohio Edison )  
Company, The Cleveland Electric Illuminating )  
Company and The Toledo Edison Company for )  
Approval of a New Rider and Revision of an )  
Existing Rider. )

Case No. 10-176-EL-ATA

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**MOTION TO INTERVENE OF THE OHIO HOSPITAL ASSOCIATION**

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Pursuant to Ohio Revised Code (“R.C.”) Section 4903.221 and Ohio Administrative Code (“OAC”) Rule 4901-1-11, the Ohio Hospital Association (“OHA”) moves for leave to intervene in this proceeding. The Public Utilities Commission of Ohio (“Commission”) should grant OHA leave to intervene because OHA has a real and substantial interest in this proceeding, and the Commission’s disposition of this proceeding may impair or impede OHA’s ability to protect that interest.

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**MEMORANDUM IN SUPPORT**

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On February 12, 2010, Ohio Edison Company The Cleveland Electric Illuminating Company and The Toledo Edison Company (collectively “FirstEnergy”) filed an Application with the Commission for approval of a new rider, Residential Generation Credits (“Rider RGC”) which would provide rate credits to residential customers on certain rate schedules. At the same time, FirstEnergy requested that its Economic Development Rider (“Rider EDR”) be revised to

permit cost recovery through Rider EDR of the Rider RGC credits. Rider EDR, as presently constituted, is collected only from customers taking service under Rates GS and GP.

The OHA is a private, nonprofit trade association with about 175 hospitals and 40 healthcare system members that have more than 700 electricity accounts statewide. Collectively, OHA members annually spend well in excess of \$150 million for electric services. A significant amount of that expenditure is for electric service provided by the FirstEnergy operating companies to the approximately 60 OHA member hospitals in FirstEnergy's service areas, most of which take service from FirstEnergy under Rate GP, but also have accounts that may be served under Rate GS. Every hospital, or virtually every hospital, in FirstEnergy's service area is a member of OHA and all OHA member hospitals are posted at <http://www.ohanet.org/Members>.

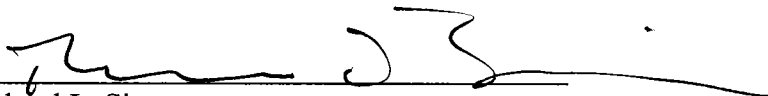
The OHA should be permitted to intervene in the above-captioned proceeding because it has real and substantial interests. OHA is concerned that the ultimate resolution of the matters to be addressed in the above-captioned proceeding could have a substantial effect on the ability of OHA members in the service area of FirstEnergy to achieve the potential cost savings that well-designed efficiency programs may provide. A significant component of hospital costs is electric, estimated in 2008 at about \$4500 per staffed bed per annum, and such costs are necessarily passed on to patients, their families, businesses and taxpayers. 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 FirstEnergy 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 this proceeding 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 this proceeding and should grant its Motion to Intervene pursuant to R.C. Section 4903.221 and OAC Rule 4901-1-11.

Respectfully submitted on behalf of  
OHIO HOSPITAL ASSOCIATION



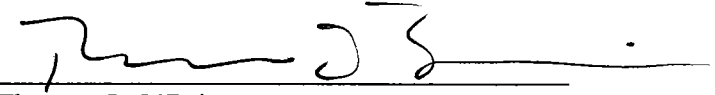
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 1<sup>st</sup> day of March 2010 *via* first class mail.

  
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Summary: Motion to Intervene electronically filed by Teresa Orahood on behalf of Ohio Hospital Association