

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Columbus)	
Southern Power Company for Approval of a)	
Mechanism to Recover Deferred Fuel Costs Ordered)	Case No. 11-4920-EL-RDR
Under Ohio Revised Code 4928.144.)	
In the Matter of the Application of Ohio Power)	
Company for Approval of a Mechanism to Recover)	
Deferred Fuel Costs Ordered Under Ohio Revised)	Case No. 11-4921-EL-RDR
Code 4928.144.)	

MOTION TO INTERVENE OF THE OHIO HOSPITAL ASSOCIATION

Pursuant to Ohio Revised Code Section (“R.C.”) 4903.221, 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.

MEMORANDUM IN SUPPORT

On September 1, 2011, Southern Power Company and Ohio Power Company (collectively, “AEP Ohio” or “Company”) filed an application for approval of a mechanism to recover deferred fuel costs. AEP Ohio deferred these fuel costs as part of the phase-in of rates to enable the yearly rate caps ordered in AEP Ohio’s 2008 electric security plan (“ESP”) case.

The members of OHA will be affected by the Commission's determination in this matter, and should be permitted to intervene in the above-captioned proceedings because it has real and substantial interests.

OHA is a private nonprofit trade association established in 1915 as the first state-level hospital association in the United States and is the only Ohio trade association representing hospitals with 168 private, state and federal government hospitals and more than 18 health systems. OHA's mission is to be a membership-driven organization that provides proactive leadership to create an environment in which Ohio hospitals are successful in serving their communities. The approximately 50 hospitals receiving electricity from AEP Ohio are OHA members and consume significant amounts of electrical energy, relying on their host electric distribution utilities of the AEP Companies to deliver the electric power necessary to provide patient care. Every hospital, or virtually every hospital, in AEP Ohio's service area is a member of OHA and all OHA member hospitals are posted at <http://www.ohanet.org/Members>.

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 the AEP Ohio, 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 very day of the year in order to provide medical care. Pertinent to this proceeding is the additional fact that all hospitals are required by federal regulators and accrediting organization 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, and hospitals in turn depend upon electric companies to provide reliable service at an affordable rate. The outcome of this case will significantly impact the reasonableness of AEP Ohio's rates charged to hospitals for the foreseeable future.

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 these matters 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. 4903.221 and OAC Rule 4901-1-11.

Respectfully submitted on behalf of
THE 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 22nd day of March *via* electronic mail and/or first class mail.



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