

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power)	
Company to Establish Initial Storm Damage)	Case No. 12-3255-EL-RDR
Recovery Rider Rates.)	

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

Pursuant to Ohio Revised Code Section (“R.C.”) 4903.221, Ohio Administrative Code (“OAC”) Rule 4901-1-11, and the Attorney Examiner entries dated January 15, 2013 and February 15, 2013, the Ohio Hospital Association (“OHA”) herewith moves for leave to intervene in the above-captioned proceeding. The OHA requests that the Public Utilities Commission of Ohio (“Commission”) grant OHA leave to intervene because OHA has a real and substantial interest in this proceeding, its participation will not cause undue delay, and the Commission’s disposition of this proceeding may impair or impede OHA’s ability to protect that interest.

MEMORANDUM IN SUPPORT

On December 21, 2012, AEP-Ohio filed an application for authority to establish its initial storm damage recovery rider (“SDRR”) rates for storms that occurred on June 29, 2012 as well as two other major storms that occurred in July 2012. This filing was preceded by the approval of the SDRR in the August 8, 2012, Opinion and Order in Case No. 11-346-EL-SSO, et al. (“ESP Order”). In the ESP Order, the Commission determined that AEP must provide certain specified

information to the Commission Staff to audit to determine if additional proceedings are necessary to establish recovery levels or refunds as necessary. ESP Order at p. 68.

The members of OHA located within the AEP-Ohio service territory 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.

The OHA is a private, nonprofit trade association with 167 hospitals, 54 of which are AEP-Ohio customers, and 19 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—approximately \$4,500 a year for each staffed hospital bed. 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. 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>.

The OHA has been proactively involved in efforts to enhance electric service reliability to its members through both its advocacy before the Commission and through informal cooperative discussions with Ohio's EDUs. The OHA is keenly interested in insuring that the ultimate resolution of the matters in this proceeding will have a positive impact on the reliability of the electricity delivered to of OHA members, while ensuring that rates remain reasonable. The 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.

COMMENTS

The OHA did not object to AEP-Ohio's request for SDRR in Case No. 11-346-EL-SSO, nor does it now oppose AEP-Ohio's recovery of extraordinary costs through the SDRR to recover incremental expenses incurred due to major storm events. However, without an opportunity to review the Commission Staff's finding with respect to its audit of AEP-Ohio's application in this case, it is impossible for the OHA or any other party for that matter, to opine on the reasonableness of the Staff's determination, one way or the other. Accordingly, OHA believes that the Commission should establish a process whereby there is a proper public review of AEP-Ohio's expenses, as well as the appropriate time period for any recovery, to ensure that there is no over-recovery of storm costs by AEP-Ohio and to ensure that such recovery is not unduly burdensome on customers through too short, or too long (aka, undue carrying charges) a recovery period.

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. Moreover, the Commission should not approve AEP-Ohio's application without establishing a process for proper review of the expenses.

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 and Comments was served upon the parties of record listed below *via* electronic mail this 29th day of May 2013.



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Summary: Motion to Intervene and Comments of The Ohio Hospital Association electronically filed by Teresa Orahod on behalf of Thomas O'Brien