

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to §4928.143, Revised Code, in the Form of an Electric Security Plan.	)	
	)	
	)	Case No. 13-2385-EL-SSO
	)	
In the Matter of the Application of Ohio Power Company for Approval of Certain Accounting Authority.	)	
	)	
	)	Case No. 13-2386-EL-AAM
	)	

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

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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 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.

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**MEMORANDUM IN SUPPORT**

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On December 20, 2013, Ohio Power Company (“AEP Ohio”) filed an Application to establish a standard service offer (“SSO”) in the form of an electric security plan (“ESP”). Also on December 20, 2013 AEP Ohio filed an Application for approval of certain accounting authorities.

The members of OHA located within the AEP-Ohio service territory will be affected by the Commission’s determination in these matters, 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 213 hospitals, 55 of which are AEP-Ohio customers, and 22 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 continues to be 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 substantial impact on the reliability of the electricity delivered to of OHA members. 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.

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 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 8<sup>th</sup> day of January 2014 *via* electronic mail.



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