

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Filing by Ohio Edison Company, The)	
Cleveland Electric Illuminating Company, and The Toledo)	Case No. 16-481-EL-UNC
Edison Company of a Grid Modernization Business Plan.)	

MOTION TO INTERVENE OF THE OHIO HOSPITAL ASSOCIATION

Pursuant to Ohio Revised Code Section (“R.C.”) 4903.221 and Ohio Administrative Code (“OAC”) Rule 4901-1-11, the Ohio Hospital Association (“OHA”) moves to intervene in the above-captioned proceeding.

On February 29, 2016, the Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively “FirstEnergy or Companies”) filed a grid modernization business plan (“Plan”) in the above-captioned proceeding, which FirstEnergy asserts is in compliance with a commitment it made in its fourth electric security plan proceeding, Case No. 14-1297-EL-SSO. FirstEnergy states that the Plan provides a “starting point” for a collaborative process in which interested parties will have the opportunity to provide feedback and make suggestions.

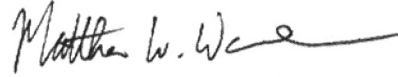
The members of OHA located within the FirstEnergy service territory will be affected by the determination of the Public Utilities Commission of Ohio (the “PUCO”) in this matter, and this Motion to Intervene should be granted because OHA has a real and substantial interest in this proceeding, and the PUCO’s disposition of this proceeding may impair or impede OHA’s ability to protect that interest.

The OHA is a private, nonprofit trade association comprised of 220 hospitals, 68 of which are served by the FirstEnergy companies. All OHA member hospitals are listed at <http://www.ohanet.org/Members>, and every hospital, or virtually every hospital, in FirstEnergy's service area is a member of OHA. In total, OHA members served by FirstEnergy consumed more than 1,500 GWh of electricity in 2015. Residents in the area served by FirstEnergy rely on OHA-member hospitals more than 13.8 million times each year for health care services on a combined in-patient and out-patient basis, according to 2014 data. 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 OHA continues to be involved in efforts to enhance electric service reliability and modernization of the electric grid to its members through both its advocacy before the PUCO and informal cooperative discussions with Ohio's electric distribution utilities, including First Energy. The OHA is keenly interested in ensuring that the ultimate resolution of the matters in this proceeding have a positive and substantial impact on the electric grid, in particular the reliability of the electricity delivered to 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 proceeding, 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 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



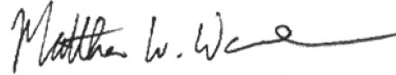
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 13th day of July 2016 *via* electronic mail.



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Case No(s). 16-0481-EL-UNC

Summary: Motion to Intervene of the Ohio Hospital Association electronically filed by Teresa Orahod on behalf of Matthew W. Warnock