

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy Ohio, Inc. for Approval to Modify Rider PSR.)	Case No. 17-872-EL-RDR
)	
In the Matter of the Application of Duke Energy Ohio, Inc. for Approval to Amend Rider PSR.)	Case No. 17-873-EL-ATA
)	
In the Matter of the Application of Duke Energy Ohio, Inc. for Approval to Change Accounting Methods.)	Case No. 17-874-EL-AAM
)	

MOTION TO INTERVENE OF THE OHIO HOSPITAL ASSOCIATION

Pursuant to Ohio Revised Code Section (“R.C.”) 4903.221, and Ohio Administrative Code (“O.A.C.”) Rule 4901-1-11, the Ohio Hospital Association (“OHA”) moves for intervention in the above-captioned proceedings. OHA requests that the Public Utilities Commission of Ohio (“Commission”) grant OHA’s motion because it has a real and substantial interest in these proceedings, its participation will not cause undue delay, and the Commission’s disposition of these proceedings may impair or impede OHA’s ability to protect that interest.

Respectfully submitted on behalf of
THE OHIO HOSPITAL ASSOCIATION



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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke)	
Energy Ohio, Inc. for Approval to Modify)	Case No. 17-872-EL-RDR
Rider PSR.)	

In the Matter of the Application of Duke)	
Energy Ohio, Inc. for Approval to Amend)	Case No. 17-873-EL-ATA
Rider PSR.)	

In the Matter of the Application of Duke)	
Energy Ohio, Inc. for Approval to Change)	Case No. 17-874-EL-AAM
Accounting Methods.)	

MEMORANDUM IN SUPPORT

On March 31, 2017, Duke Energy Ohio, Inc. (“Duke”) filed an application for approval to make several modifications to its Price Stabilization Rider (“Rider RSR”) which includes a request to populate Rider RSR to collect the net costs associated with its ownership share in Ohio Valley Electric Corporation (“OVEC”) generation facilities. Duke also requests that the term of Rider RSR be extended through June 30, 2040.

OHA’s members are end-use customers of Duke and, as such, are subject to Duke’s electric distribution rates. In its application, Duke proposes that revenues and costs associated its contractual entitlement in OVEC be flowed through to customers on a nonbypassable basis under Rider RSR. Because OHA’s members may be subject to Rider RSR, OHA has a real and substantial interests in the above-captioned proceedings and should be permitted to intervene.

OHA is a private, nonprofit trade association with 220 hospitals, 20 of which are Duke’s customers. These OHA-member hospitals served by Duke consumed more than 400 GWh of

electricity in 2015. In addition to the 20 hospitals served by Duke, there are a number of outpatient, medical office buildings, urgent care and freestanding emergency rooms owned by the hospitals or their health systems which are located in Duke's territory. Residents in the areas served by Duke rely on OHA-member hospitals and their health systems over 3.2 million times per 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. Every hospital, or virtually every hospital, in Duke's service area is a member of OHA, and all OHA member hospitals are posted at <https://www.ohiohospitals.org/Ohio-Hospitals/Member-Hospitals.aspx>.

OHA is involved in efforts to enhance electric service reliability and control the cost of electric service for its members through advocacy before the Commission. OHA is keenly interested in ensuring that the ultimate resolution of these proceedings will not have a negative impact on OHA-member hospitals' ability to effectively serve the public. OHA has a substantial interest in these proceedings which is not adequately addressed by any other party. Further, OHA's participation will enhance the effectiveness of the above proceedings and will not unnecessarily cause delay.

Accordingly, OHA respectfully requests the Commission grant its Motion to Intervene pursuant to R.C. 4903.221 and O.A.C. Rule 4901-1-11.

Respectfully submitted on behalf of
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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 in these proceedings by electronic mail this 3rd day of May 2017.



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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/3/2017 4:37:52 PM

in

Case No(s). 17-0872-EL-RDR, 17-0873-EL-ATA, 17-0874-EL-AAM

Summary: Motion to Intervene of The Ohio Hospital Association electronically filed by Teresa Orahoud on behalf of Dylan F. Borchers and Parram, Devin D.