

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The Dayton)
Power and Light Company for Approval of Its) Case No. 18-1875-EL-GRD
Plan to Modernize Its Distribution Grid.)

In the Matter of the Application of The Dayton)
Power and Light Company for Approval of a)
Limited Waiver of Ohio Adm. Code 4901:1-) Case No. 18-1876-EL-WVR
18-06(A)(2).)

In the Matter of the Application of The Dayton)
Power and Light Company for Approval of) Case No. 18-1877-EL-AAM
Certain Accounting Methods.)

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”) herewith moves for leave to intervene in the above-captioned proceedings. OHA requests that the Public Utilities Commission of Ohio (“Commission”) grant OHA leave to intervene because OHA 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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MEMORANDUM IN SUPPORT

On December 21, 2019, The Dayton Power and Light Company (“DP&L” or “the Company”) filed an application for approval of its Distribution Modernization Plan (“DMP” or the “Plan”). Through its DMP, DP&L seeks to impose costs upon its customers to implement its Distribution Modernization Plan which could ultimately affect the members of OHA located within the DP&L service territory. Thus, OHA should be permitted to intervene in the above-captioned proceedings because it has real and substantial interests.

OHA is a private, nonprofit trade association with approximately 246 hospitals, a number of which are DP&L customers. 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 DP&L’s service area is a member of OHA, and all OHA member hospitals are posted at <https://www.ohiohospitals.org/About-OHA/Ohio-Hospitals/Member-Hospitals>.

OHA continues to be involved in efforts to enhance electric service reliability and contain costs for its members through both its advocacy before the Commission and through informal cooperative discussions with Ohio's EDUs. OHA is keenly interested in insuring that the ultimate resolution of the matters in these proceedings will not have a negative impact on the reliability of the electricity delivered to OHA-member hospitals. OHA has a substantial interest in these proceedings 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 this matter 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 grant its Motion to Intervene pursuant to R.C. 4903.221 and OAC Rule 4901-1-11.

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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 2019 *via* electronic mail.



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Case No(s). 18-1875-EL-GRD, 18-1876-EL-WVR, 18-1877-EL-AAM

Summary: Motion of The Ohio Hospital Association and Memorandum in Support
electronically filed by Teresa Orahod on behalf of Devin D. Parram