

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)	
Power Company for Approval of its)	
Temporary Plan for Addressing the)	Case No. 20-602-EL-UNC
COVID-19 State of Emergency.)	

In the Matter of the Application of Ohio)	
Power Company for Waiver of Tariffs and)	
Rules Related to the COVID-19 State of)	Case No. 20-603-EL-WVR
Emergency.)	

In the Matter of the Application of Ohio)	
Power Company for Approval of Certain)	Case No. 20-604-EL-AAM
Accounting Authority.)	

In the Matter of the Application of Ohio)	
Power Company for Approval of A)	Case No. 20-734-EL-AEC
Reasonable Arrangement.)	

MOTION TO INTERVENE OF THE OHIO HOSPITAL ASSOCIATION

Pursuant to Ohio Revised Code (“R.C.”) Section 4903.221 and Ohio Administrative Code Rule (“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.

Respectfully submitted on behalf of
THE OHIO HOSPITAL ASSOCIATION



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MEMORANDUM IN SUPPORT

On March 9, 2020, Governor DeWine declared a state of emergency to protect the health and safety of Ohioans from the dangerous effects of the coronavirus pandemic. On March 12, 2020, the Public Utilities Commission of Ohio (“PUCO” or “Commission”) opened a docket and directed all utility companies to review their service disconnection policies, practices, and tariffs and promptly seek approval to suspend requirements that may impose a service continuity hardship or create unnecessary COVID-19 risks. On March 17, 2020, Ohio Power Company (“AEP Ohio”) filed an application, as amended on March 24, 2020 and April 9, 2020, for approval of its temporary plan for addressing the COVID-19 state of emergency. On April 15, 2020, Staff filed its review and recommendations in response to AEP Ohio’s proposed

emergency plan, as amended. By entry dated April 17, 2020, the attorney examiner established a deadline for filing motions to intervene and comments.

OHA is a nonprofit trade association with over 200 hospitals, 55 of which are AEP Ohio customers. These OHA-member hospitals served by AEP Ohio consume a significant amount of electricity. Residents in the area served by AEP Ohio rely on those 55 OHA-member hospitals over well over one million times per year for health care services on a combined in-patient and out-patient basis. 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>.

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 this proceeding will not have a significantly negative impact on the cost or reliability of the electricity delivered to OHA-member hospitals. Moreover, AEP's application contains provisions directly related to the OHA and COVID-19 crisis.¹ These provisions were identified and commented upon in the subsequent PUCO Staff review and recommendation.

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 this matter are fair to its membership.

¹ AEP Second Amended Application, at p. 10.

Accordingly, OHA respectfully requests the Commission to determine that OHA has a real and substantial interest in this proceeding and grant its Motion to Intervene pursuant to R.C. 4903.221 and OAC 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 this proceeding by electronic mail this 24th day of April 2020.



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Case No(s). 20-0602-EL-UNC, 20-0603-EL-WVR, 20-0604-EL-AAM, 20-0734-EL-AEC

Summary: Motion to Intervene of The Ohio Hospital Association electronically filed by Teresa Orahod on behalf of Dylan F. Borchers