

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of the Political)
and Charitable Spending by Ohio Edison)
Company, The Cleveland Electric)
Illuminating Company, and The Toledo)
Edison Company)

Case No. 20-1502-EL-UNC

MOTION TO INTERVENE OF THE OHIO HOSPITAL ASSOCIATION

Pursuant to Ohio Revised Code Section (“R.C.”) 4903.221 and Ohio Administrative Code (“OAC”) 4901-1-11, the Ohio Hospital Association (“OHA”) moves to intervene in the above-captioned proceeding. OHA requests that the Public Utilities Commission of Ohio (“Commission” or “PUCO”) grant OHA leave to intervene because OHA has a real and substantial interest in this proceeding, its participation will not cause undue delay, and the Commission’s disposition of this proceeding may impair or impede OHA’s ability to protect that interest.

Respectfully submitted on behalf of
THE OHIO HOSPITAL ASSOCIATION



Dylan F. Borchers
Devin D. Parram
Jhay T. Spottswood
BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215-4291
Telephone: (614) 227-2300
Facsimile: (614) 227-2390
E-mail: dborchers@bricker.com
dparram@bricker.com
jspottswood@bricker.com

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MEMORANDUM IN SUPPORT

By Attorney Examiner Entry of September 15, 2020, the Public Utilities Commission of Ohio (“Commission”) initiated this proceeding to review the political and charitable spending by FirstEnergy electric distribution utilities’ (collectively “FirstEnergy”)¹ and directed FirstEnergy to show cause that the costs of any political or charitable spending in support of Am. Sub. H.B. 6, or the subsequent referendum effort, were not included, either directly or indirectly, in any rates or charges paid by Ohio ratepayers.

The members of OHA located within the FirstEnergy service territory will be affected by the determination of the Commission 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.

OHA is a private, nonprofit trade association comprised of approximately 240 hospitals, many of which are served by FirstEnergy. All OHA member hospitals are listed at <http://www.ohanet.org/Members>. OHA’s mission is to collaborate with member hospitals and health systems to ensure a healthy Ohio.

¹ “FirstEnergy” refers to FirstEnergy Corp’s Ohio operating electric companies: Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company.

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 FirstEnergy. OHA is keenly interested in ensuring that the ultimate resolution of the matters in this proceeding have a positive impact on OHA members. 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 4901-1-11.

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Columbus, OH 43215-4291
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dparram@bricker.com
jspottswood@bricker.com

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 7th day of October 2020 *via* electronic mail.



Dylan F. Borchers

bknipe@firstenergycorp.com
jlang@calfee.com
khehmeyer@calfee.com
bojko@carpenterlipps.com
mkurtz@BKLawfirm.com
kboehm@BKLawfirm.com
jkylercohn@BKLawfirm.com
Maureen.willis@occ.ohio.gov
Angela.obrien@occ.ohio.gov
rkelter@elpc.org
mleppla@theOEC.org
tdougherty@theOEC.org
ctavenor@theOEC.org
ccox@elpc.org
rdove@keglerbrown.com
bethany.allen@igs.com
joe.oliker@igs.com
michael.nugent@igs.com
leslie.kovacik@toledo.oh.gov
trhayslaw@gmail.com
John.jones@ohioattorneygeneral.gov

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/7/2020 12:31:49 PM

in

Case No(s). 20-1502-EL-UNC

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