

FILE

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

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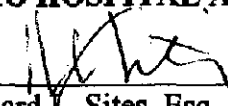
In the Matter of the Application of the Ohio)	
Edison Company, The Cleveland)	
Illuminating Company, and the Toledo)	Case No. 07-796-EL-ATM
Edison Company, for Approval of a)	Case No. 07-797-EL-AAM
Competitive Bidding Process for Standard)	
Service Offer Electric Generation Supply,)	
Accounting Modifications Associated with)	
Reconciliation Mechanisms and Phase In,)	
and Tariffs for Generation Service.)	

MOTION TO INTERVENE
OF THE OHIO HOSPITAL ASSOCIATION

Pursuant to section 4903.221 of the Ohio Revised Code and section 4901-1-11 of the Ohio Administrative Code, 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 the case may adversely affect OHA's interest.

Respectfully submitted,

OHIO HOSPITAL ASSOCIATION



Richard L. Sites, Esq.
General Counsel
Ohio Hospital Association
155 East Broad Street, 15th Floor
Columbus, OH 43215-3620
Phone: (614) 221-7614
Fax: (614) 221-4771
Email: ricks@ohanet.org

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**MEMORANDUM IN SUPPORT OF
OHIO HOSPITAL ASSOCIATION
MOTION TO INTERVENE**

The Ohio Hospital Association ("OHA") should be permitted to intervene in the above-captioned proceedings. OHA has a real and substantial interest in these proceedings and may be adversely affected by the outcome. OHA is a 501(c)(6) trade association, currently with 170 hospitals and 40 hospital systems as members. Almost all of these hospitals and healthcare systems are nonprofit, 501(c)(3) organizations that provide in excess of \$1.5 billion in community benefits as well as an additional \$700 million to subsidize losses from Medicare reimbursement and bad debt.

Hospitals are not simply acute care, inpatient facilities, but they also have medical clinic buildings, urgent care centers, skilled nursing facilities, ambulatory surgery centers, hospices and other patient care entities. Those hospitals and their affiliates are known from previous OHA study to have approximately 700 electricity accounts statewide, and are believed to annually spend about \$200 million for electric service. A study prepared by the CHP Application Center

in partnership with the U.S. Department of Energy estimated the Ohio hospitals' electric demand in 2003 was 377 Megawatts ("MW"), ranging among a sample of 26 Ohio hospitals from a low of 200 kilowatts for a 25-bed rural hospital to a high of 9.3 MW for an urban 761-bed hospital ("CHP Education/Assistance Program Guide for the Ohio Hospital Market Sector," University of Illinois at Chicago – Energy Resources Center, September 2004, posted at http://www.chpcentermw.org/pdfs/04_Sep_Ohio_Hospital_%20Report.pdf).

OHA members include virtually all hospitals situated in the service areas of the Ohio Edison Company, the Cleveland Illuminating Company and the Toledo Edison Company ("Companies"), and a significant amount of the statewide electric expenditure and demand identified above is for electric service provided by the Companies. A current list of OHA member hospitals is available on OHA's website at www.ohanet.org/about_oha/member_list.asp.

The cost of electricity represents a significant component of total hospital expenses and the adequacy and reliability of electric supply are also critical to hospital services upon which Ohio residents rely. Hospitals have somewhat unique electricity load patterns since they operate on a 24/7/365 basis and require a high level of reliability to provide effective and safe patient care. In addition to the importance of providing quality patient care, electric supply is integral for patient safety, and the cost of energy used by hospitals affects the cost of health care, availability and affordability of health insurance, and access to care by both insured and uninsured persons.


As a result of the above-stated concerns, OHA has a substantial interest in these proceedings that is not adequately addressed by any other party. OHA was an active participant in the legislative process that resulted in the electric restructuring statutes and has since been an active participant in the regulatory process. OHA's participation in this case, similar to its

participation in the previous cases involving the Companies, will enhance the effectiveness of the proceedings, will not unnecessarily cause delay, and will better ensure that the proceedings in this matter are fair to Ohio hospitals.

Accordingly, the OHA respectfully requests that the Commission determine that it has a real and substantial interest in these proceedings which could be adversely affected by the outcome, and therefore grant OHA's Motion to Intervene in this proceeding.

Respectfully submitted,

OHIO HOSPITAL ASSOCIATION



Richard L. Sites, Esq.
General Counsel
Ohio Hospital Association
155 East Broad Street, 15th Floor
Columbus, OH 43215-3620
Phone: (614) 221-7614
Fax: (614) 221-4771
Email: ricks@ohanet.org

Certificate of Service

I hereby certify that true copy of the foregoing was served by regular mail this 20th day of July 2007 to the parties listed below.



Richard L. Sites, Esq.
General Counsel for the Ohio Hospital Association

Parties of Record

Attorneys

CLEVELAND ELECTRIC
ILLUMINATING CO
HARVEY WAGNER VP AND
CONTROLLER
76 S. MAIN STREET
AKRON OH 44308

NONE

FIRSTENERGY CORP.
LEILA VESPOLI
76 S. MAIN STREET
AKRON OH 44308

NONE

OHIO EDISON COMPANY
HARVEY WAGNER, VP & CONTR
76 S. MAIN STREET
AKRON OH 44308

BURK, JAMES ATTORNEY-AT-LAW
FIRSTENERGY SERVICE COMPANY
76 SOUTH MAIN STREET
AKRON OH 44308

TOLEDO EDISON COMPANY
HARVEY WAGNER, VP AND
CONTROLLER
76 S. MAIN STREET
AKRON OH 44308

NONE

none

HADICK, STEPHEN N.
76 S. MAIN STREET 8TH FLOOR
AKRON OH 44308

none	KOLICH, KATHY ATTORNEY AT LAW FIRSTENERGY CORP 76 SOUTH MAIN STREET AKRON OH 44308
none	BOEHM, DAVID ESQ. BOEHM, KURTZ & LOWRY 36 EAST SEVENTH STREET SUTTE 1510 CINCINNATI OH 45202-4454
none	HEYDORN, ROBERT HOOVER, HEYDORN & HERRNSTEIN 527 PORTAGE TRAIL CUYAHOGA FALLS OH 44221
none	GOLDBERG, PAUL COUNSEL FOR CITY OF OREGON 5300 SEAMAN ROAD OREGON OH 43616
none	GREENBERG, FREDDI 1603 ORRINGTON AVE SUITE 1050 EVANSTON IL 60201
none	ALLOTTA, JOSEPH ALLOTTA AND FRALEY CO., L.P.A. 2222 CENTENNIAL ROAD TOLEDO OH 43617
none	SANDERS , JUDITH BELL, ROYER & SANDERS CO., LPA 33 S. GRANT AVE COLUMBUS OH 43215

none

STINSON, DANE ESQ.
BAILEY CAVALIERI LLC
10 W. BROAD ST. SUITE 2100
COLUMBUS OH 43215

none

KRASSEN, GLENN ATTORNEY AT
LAW
BRICKER & ECKLER LLP
1375 EAST NINTH STREET SUITE 1500
CLEVELAND OH 44114-1718

none

SINGH, BOBBY
CHESTER, WILLCOX & SAXBE LLP
65 E. STATE STREET SUITE 1000
COLUMBUS OH 43215

none

ROBINSON, EVELYN
GREEN MOUNTAIN ENERGY
COMPANY
1721 LEIGHTON DRIVE
REYNOLDSBURG OH 43068

none

LIEBMAN, HELEN ESQ.
JONES DAY
P.O. BOX 165017
COLUMBUS OH 43216-5017

none

GIBBON, JOHN LAW DIRECTOR
CITY OF CLEVELAND HEIGHTS
TOWER AT ERIEVIEW 1301 E. 9TH ST,
STE 3500
CLEVELAND OH 44114-1821

none

LEWIS, FRANKLIN ATTORNEY AT
LAW
CITY OF CLEVELAND
601 LAKESIDE AVENUE ROOM 106
CLEVELAND OH 44114

none

BENTINE, JOHN
CHESTER, WILCOX & SAXBE, LLP
65 EAST STATE STREET SUITE 1000
COLUMBUS OH 43215-4213

none

FELD, STEPHEN
SENIOR ATTORNEY
FIRSTENERGY CORP. 76 SOUTH MAIN
STREET
AKRON OH 44308

none

HAEFNER, JOSEPH
CITY OF STOW
3760 DARROW ROAD
STOW OH 44224

none

HOTZ, ANN
OFFICE OF CONSUMERS' COUNSEL
10 W. BROAD STREET, SUITE 1800
COLUMBUS OH 43215

OHIO CONSUMERS COUNSEL
10 W. BROAD STREET SUITE 1800
COLUMBUS OH 43215-3485

SMALL, JEFFREY
OHIO CONSUMERS' COUNSEL
10 WEST BROAD STREET SUITE 1800
COLUMBUS OH 43215-3485

BOB SCHMITT HOMES INC
KEVIN CORCORAN
8501 WOODBRIDGE COURT
NORTH RIDGEVILLE OH 44039

NONE

CALPINE CORPORATION
PATRICK J KEALY, ESQ.
717 TEXAS STREET
HOUSTON TX 77002-2761

CONDO, JOSEPH
CALPINE CORPORATION
SENIOR COUNSEL 250 PARKWAY
DRIVE, STE 380
LINCOLNSHIRE IL 60069

CARGILL, INC.
P.O. BOX 336
MENTONE IN 46539

SMITH, CRAIG
ATTORNEY AT LAW
2824 COVENTRY RD.
CLEVELAND OH 44120

CITIZEN POWER
DAVID HUGHES, EX. DIR.
4037 LUDWICK
PITTSBURGH PA 15217

GRUBER, WILLIAM
ATTORNEY AT LAW
2714 LEIGHTON ROAD
SHAKER HEIGHTS OH 44120

CITY OF CLEVELAND
ROBERT J. TRIOZZI, DIRECTOR OF
LAW
CITY HALL, ROOM 106
601 LAKESIDE DRIVE
CLEVELAND OH 44114

NONE

CITY OF CLEVELAND HEIGHTS
JOHN GIBBON
40 SEVERANCE CIRCLE
CLEVELAND HEIGHTS OH 44118

ZIGLI, WILLIAM
TRIAL ATTORNEY
601 LAKESIDE AVENUE ROOM 106
CLEVELAND OH 44114-1077

CITY OF EUCLID
BILL CERVENIK, MAYOR
585 EAST 22ND STREET
EUCLID OH 44123

VENTO, PHYLLIS ASST. DIRECTOR
OF LAW
CITY OF EUCLID
585 E. 222ND STREET
EUCLID OH 44123-2099

CITY OF MAUMEE
SHEILAH MCADAMS
400 CONANT STREET
MAUMEE OH 43537

MCADAMS, SHEILAH
CITY OF MAUMEE
204 W. WAYNE STREET
MAUMEE OH 43537

CITY OF OREGON
PAUL S. GOLDBERG, LAW DIRECTOR
5330 SEAMAN ROAD
OREGON OH 43616

NONE

CITY OF PERRYSBURG
MARK FRYE, CONSULTANT
300 SYCAMORE LN
PERRYSBURG OH 43551

GWYN, PETER D.
ATTORNEY AT LAW
300 SYCAMORE LN
PERRYSBURG OH 43551

CITY OF PERRYSBURG
PETER D. GWYN, LAW DIRECT
300 SYCAMORE LN
PERRYSBURG OH 43551

NONE

CITY OF STOW
DANO L. KOEHLER, SERVICE
DIRECTOR
3760 DARROW ROAD
STOW OH 44224-4094

NONE

CITY OF SYLVANIA
JAMES E. MOAN
4930 HOLLAND-SYLVANIA ROAD
SYLVANIA OH 43560

MOAN, JAMES E.
COUNSEL FOR CITY OF SYLVANIA
4930 HOLLAND-SYLVANIA RD.
SYLVANIA OH 43560

CITY OF TOLEDO
LESLIE A. KOVACIK, SENIOR
ATTORNEY
420 MADISON AVENUE FOURTH
FLOOR
TOLEDO OH 43604

KOVACIK, LESLIE
DEPARTMENT OF PUBLIC UTILITIES
420 MADISON AVENUE SUITE 100
TOLEDO OH 43604

CLEVELAND HOUSING NETWORK
2999 PAYNE AVENUE
CLEVELAND OH 44114

NONE

CONSUMERS FOR FAIR UTILITIES
RATES
TIM WALTERS
4115 BRIDGE AVENUE
CLEVELAND OH 44113

NONE

DAVIS, DOLORES J
42 ORCHARD STREET

NEWTON FALLS OH 44444

MILLARD, STEVEN
200 TOWER CITY CENTER 50 PUBLIC
SQUARE
CLEVELAND OH 44113

DIRECT ENERGY SERVICES, LLC
JOHN COMOLL
1111 W. 22ND STREET SUITE 810
OAKBROOK IL 60523

NONE

EMPOWERMENT CENTER OF
GREATER CLEVELAND
3030 EUCLID AVENUE UNIT 100
CLEVELAND OH 44115

MEISSNER, JOSEPH

DIRECTOR OF URBAN
DEVELOPMENT
1223 WEST SIXTH STREET
CLEVELAND OH 44113

FIRSTENERGY CORP.
LEILA VESPOLI
76 S. MAIN STREET
AKRON OH 44308

BURK, JAMES ATTORNEY-AT-LAW
FIRSTENERGY SERVICE COMPANY
76 SOUTH MAIN STREET
AKRON OH 44308

IBEW LOCAL 1194
ATTN. DAVE CHILDERS
17 WEST CHURCH ST. P.O. BOX 145
MILAN OH 44846

NONE

IBEW LOCAL 245
ATTN. LARRY TSCHERNE
705 LIME CITY RD.
ROSSFORD OH 43460

NONE

INDUSTRIAL ENERGY USERS OF
OHIO
SAMUEL C. RANDAZZO, GENERAL
COUNSEL
MCNEES WALLACE & NURICK LC
21 E. STATE STREET, 17TH FLOOR
COLUMBUS OH 43215

RANDAZZO, SAMUEL C.

MCNEES WALLACE & NUICK

21 EAST STATE ST, 17TH FLOOR
COLUMBUS OH 43215

INTEGRYS ENERGY SERVICES INC NONE
TERESA RINGENBACH
600 SUPERIOR AVE., SUTTE 1300
CLEVELAND OH 44114

INTEGRYS ENERGY SERVICES, INC. NONE
DANIEL VERBANAC, COO
1716 LAWRENCE DRIVE
DE PERE WI 54115

KROGER COMPANY, THE MR. DENIS GEORGE 1014 VINE STREET-GO7 CINCINNATI OH 45202-1100	KURTZ, MICHAEL BOEHM, KURTZ & LOWRY 36 EAST SEVENTH STREET SUITE 1510 CINCINNATI OH 45202
---	---

KUBIT, SCOTT T. HENRY W ECKHART 50 WEST BROAD STREET #2117 COLUMBUS OH 43215	NONE
---	------

LAKE TOWNSHIPS TRUSTEES THOMAS R. HAYS 3315 CENTENNIAL ROAD SUITE A2 SYLVANIA OH 43560-9419	NONE
--	------

LEGAL AID SOCIETY OF CLEVELAND JOSEPH MEISSNER URBAN DEVELOP OFF, 1223 W. SIXTH ST CLEVELAND OH 44113	MEISSNER, JOSEPH DIRECTOR OF URBAN DEVELOPMENT 1223 WEST SIXTH STREET CLEVELAND OH 44113
---	--

LUCAS CO., BOARD OF COUNTY COMMISSIONERS LANCE M. KEIFFER, ASST. PROSECUTING ATTORNEY 711 ADAMS STREET TOLEDO OH 43624	KEIFFER, LANCE ASSISTANT PROSECUTING ATTORNEY 711 ADAMS STREET 2ND FLOOR TOLEDO OH 43624-1680
---	---

MIDAMERICAN ENERGY COMPANY	PETRICOFF, M.
BARBARA HAWBAKER, BALANCING & SETTLEMENT ANALYST	VORYS, SATER, SEYMOUR & PEASE
4299 NW URBANDALE DRIVE	52 EAST GAY STREET P.O. BOX 1008
URBANDALE IA 50322	COLUMBUS OH 43216-1008

NATIONAL ENERGY MARKETERS ASSOCIATION	GOODMAN, CRAIG
CRAIG G. GOODMAN, ESQ.	NATIONAL ENERGY MARKETERS ASSOC.
3333 K STREET N.W. SUITE 110	3333 K STREET, N.W. SUITE 110
WASHINGTON DC 20007	WASHINGTON DC 20007

NEIGHBORHOOD ENVIRONMENTAL COALITION	NONE
REV. MIKE FRANK, CO-CHAIR	
5920 ENGLE AVE.	
CLEVELAND OH 44127	

NEIGHBORHOOD ENVIRONMENTAL COALITION	NONE
REV. MIKE FRANK, CO-CHAIR	
5920 ENGLE AVE.	
CLEVELAND OH 44127	

NERA ECONOMIC CONSULTING	NONE
CHANTALE LACASSE	
1166 AVENUE OF THE AMERICAS	
NEW YORK NY 10036	

none	RUXIN, PAUL
	JONES, DAY, REAVIS & POGUE
	NORTH POINT 901 LAKESIDE AVENUE
	CLEVELAND OH 44114

NORTHEAST OHIO PUBLIC ENERGY COUNCIL 583 EAST AURORA ROAD MACEDONIA OH 44056-1837	NONE
NORTHWEST OHIO AGGREGATION COALITION ONE GOVERNMENT CENTER, #2250 TOLEDO OH 43604	KEIFFER, LANCE ASSISTANT PROSECUTING ATTORNEY 711 ADAMS STREET 2ND FLOOR TOLEDO OH 43624-1680
NORTHWEST OHIO AGGREGATION COALITION ONE GOVERNMENT CENTER, #2250 TOLEDO OH 43604	KOVACIK, LESLIE DEPARTMENT OF PUBLIC UTILITIES 420 MADISON AVENUE SUITE 100 TOLEDO OH 43604
OHIO CITIZEN ACTION 614 W. SUPERIOR AVE. SUITE 1200 CLEVELAND OH 44113-1306	WEIR, SHARI OHIO CITIZEN ACTION 614 W. SUPERIOR AVE. SUITE 1200 CLEVELAND OH 44113-1306
OHIO HOME BUILDERS ASSOCIATION TODD GELETKA 17 S. HIGH ST. #700 COLUMBUS OH 43215	NONE
OHIO MANUFACTURERS' ASSOCIATION ERIC L. BURKLAND, PRESIDENT 33 NORTH HIGH STREET COLUMBUS OH 43215-3005	NONE
OHIO PARTNERS FOR AFFORDABLE ENERGY DAVID RINEBOLT 337 SOUTH MAIN STREET 4TH FLOOR, SUITE 5, P.O. BOX 1793 FINDLAY OH 45839-1793	RINEBOLT, DAVID LAW DIRECTOR 231 WEST LIMA STREET P.O. BOX 1793 FINDLAY OH 45839-1793

OHIO STATE LEGAL SERVICES
ASSOC.

555 BUTTLES AVENUE
COLUMBUS OH 43215-1137

PALMER ENERGY

MARK FRYE, NOAC CONSULTANT
2455 N. REYNOLDS ROAD
TOLEDO OH 43615

PSEG ENERGY RESOURCES & TRADE
LLC

80 PARK PLAZA, 19TH FLOOR
NEWARK NJ 07102

RELIANT RESOURCES, INC, c/o
WILLIAM S. NEWCOMB, JR
VORYS, SATER, SEYMOUR AND
PEASE LLP
52 EAST GAY STREET P.O. BOX 1008
COLS OH 43216-1008

SCHNEID, THOMAS J
25105 RANDALL DR.
NORTH OLMSTED OH 44070-3455

SCULLY, SANDRA H
3430 AVALON RD
CLEVELAND OH 44120-3752

ST. CHARLES HOSPITAL

MR. KENT MEYERS
2600 NAVARRE AVENUE
OREGON OH 43616

SMALZ, MICHAEL ATTORNEY AT
LAW
OHIO STATE LEGAL SERVICE ASSOC.
555 BUTTLES AVENUE
COLUMBUS OH 43215-1137

BALLENGER, BRIAN J. LAW
DIRECTOR
BALLENGER & MOORE CO., L.P.A.
3401 WOODVILLE ROAD SUITE C
TOLEDO OH 43619

LEYDEN, SHAWN ATTORNEY AT
LAW
PSEG ENERGY RESOURCES & TRADE
LLC
80 PARK PLAZA 19TH FL
NEWARK NJ 07102

NONE

NONE

NONE

O'BRIEN, THOMAS ATTORNEY-AT-
LAW
BRICKER & ECKLER LLP
100 SOUTH THIRD STREET
COLUMBUS OH 43215

STRATEGIC ENERGY, L.L.C.
CARL W. BOYD
TWO GATEWAY CENTER
PITTSBURGH PA 15222

PETRICOFF, M.
VORYS, SATER, SEYMOUR & PEASE
52 EAST GAY STREET P.O. BOX 1008
COLUMBUS OH 43216-1008

VALLOUREC & MANNESMANN
TUBES CORP.
PETER J. BRICKFIELD
1025 THOMAS JEFFERSON STREET
NW SUITE 800 WEST
WASHINGTON DC 20007

NONE

VILLAGE OF HOLLAND
PAUL A. SKAFF, ASSISTANT
SOLICITOR
353 ELM STREET
PERRYSBURG OH 43551

NONE