

**FILE**

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**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

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.	)	

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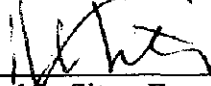
**MOTION TO INTERVENE  
OF THE OHIO HOSPITAL ASSOCIATION**

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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**

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

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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](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](http://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**

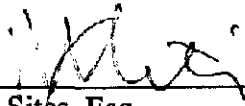


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**Certificate of Service**

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

  
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