

FILE

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of the Application of the)
Columbus Southern Power Company for)
Approval of its Electric Security Plan; an)
amendment to its Corporate Separation Plan;)
and the Sale or Transfer of Certain)
Generating Assets)

Case No. 08-917-EL-SSO

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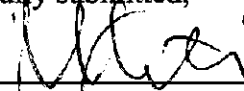
In the Matter of the Application of the Ohio)
Power Company for Approval of its Electric)
Security Plan; and an Amendment to its)
Corporate Separation Plan)

Case No. 08-918-EL-SSO

MOTION TO INTERVENE OF THE OHIO HOSPITAL ASSOCIATION

Pursuant to §4903.221 of the Ohio Revised Code and §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 these proceedings may impair or impede OHA's ability to protect that interest.

Respectfully submitted,



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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 because it has real and substantial interests. OHA was actively involved in the recent legislative process that resulted in enactment of Senate Bill 221, and has intervened since 2000 in various cases involving Ohio's electric utilities before the Public Utilities Commission of Ohio ("Commission"). The 178 hospitals and 40 healthcare system members of OHA have more than 700 electricity accounts statewide and annually spend well in excess of \$150 million for electric services. A significant amount of that expenditure is for electric service provided by the Columbus Southern Power Company and Ohio Power Company ("Companies") to the approximately 50 hospitals in their service areas. Every hospital, or virtually every hospital, in the Companies' service areas are members of OHA and all OHA member hospitals are posted at www.ohanet.org/about_oha/member_list.asp.

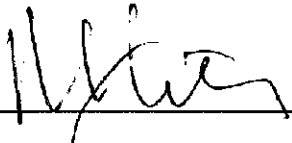
OHA is concerned that the ultimate resolution of the matters to be addressed in the above-captioned proceedings could have a substantial effect on the electricity costs of OHA members, including the hospitals in the service areas of the Companies, as well as hospital interests in power reliability, adequacy, and demand management. A significant component of hospital costs is electricity, estimated at about \$4500 per staffed bed per annum, and such costs are necessarily passed on to patients, their families, businesses and taxpayers. Additionally, hospitals have somewhat unique electricity load patterns and require reliable electric service on a 24-hour basis every day of the year in order to provide medical care. Pertinent to these proceedings is the additional fact that all hospitals are required by federal regulators and accrediting organizations to maintain emergency generators in the event of interrupted utility power, and larger hospitals in particular utilize sophisticated energy management systems and related energy efficiency technology. In sum, communities and individuals depend upon hospitals, hospitals in turn depend upon electric companies to provide reliable service at an affordable rate, and hospitals and the Companies have a common interest in matters related to energy efficiency and demand management.

As a result of the above concerns and hospital characteristics, 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 proceeding, will not unnecessarily cause delay, and will help ensure that the proceeding in this matter is fair to its membership.

Accordingly, OHA respectfully requests the Commission to determine that OHA has a real and substantial interest in these proceedings and should grant its Motion to Intervene in these

proceedings pursuant to §4903.221 of the Ohio Revised Code and §4901-1-11 of the Ohio Administrative Code.

Respectfully submitted,

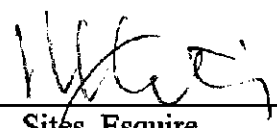


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CERTIFICATE OF SERVICE

This is to certify that a copy of the Ohio Hospital Association's Motion to Intervene and Memorandum in Support was served upon the interested parties listed below electronically or by first class U. S. mail, postage prepaid, on this 20th day of August 2008.


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