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BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

2008 AUG 22 PM 4:37

In the Matter of the Application of Ohio
Edison Company, The Cleveland
Illuminating Company, and the Toledo
Edison Company, for Authority to Establish
a Standard Service Offer Pursuant to R.C.
4928.143 in the Form of an Electric Security
Plan.

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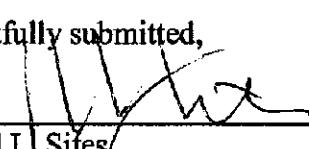
Case No. 08-935-EL-SSO

Case No. 08-936-EL-SSO

**MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT
OF 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 cases may adversely affect OHA's 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 Ohio Edison Company, the Cleveland Illuminating Company, and the Toledo Edison Company ("Companies") to the approximately 90 hospitals in their service areas. Every hospital, or virtually every hospital, in the Companies' service areas are members of OHA and a list of all OHA member hospitals is 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

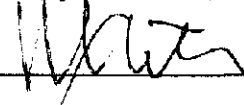
members, including the hospitals in the service areas of the Companies, as well as hospital interests in power reliability, adequacy, and demand management. A significant component of hospital costs is electricity, estimated at about \$4500 per staffed bed per annum, and such cost is necessarily passed 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-stated concerns, OHA has a substantial interest in these proceedings that is not adequately addressed by any other party. OHA's participation in these cases, similar to its participation in 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, OHA respectfully requests that the Commission determine that it has a real and substantial interest in the proceedings which could be adversely affected by the outcome, and therefore should grant OHA's Motion to Intervene pursuant to §4903.221 of the Ohio

Revised Code and §4901-1-11 of the Ohio Administrative Code.

Respectfully submitted,



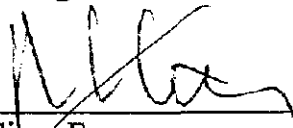
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August 22, 2008

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 22nd day of August 2008.



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