

FILE

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of the Application of Ohio Edison Company, )  
The Cleveland Electric Illuminating Company, and The )  
Toledo Edison Company for Approval of a Market Rate )  
Offer to Conduct a Competitive Bidding Process for ) Case No. 09-906-EL-SSO  
Standard Service Offer Electric Generation supply, )  
Accounting Modifications Associated with Reconciliation )  
Mechanism, and Tariffs for Generation Service. )

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

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Pursuant to Ohio Revised Code ("R.C.") Section 4903.221 and Ohio Administrative Code ("OAC") Rule 4901-1-11, 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.

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**MEMORANDUM IN SUPPORT**

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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 legislative process that resulted in enactment of Senate Bill 221, and was granted intervention in the prior standard service offering ("SSO") proceeding filed by Ohio Edison

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Company, Cleveland Electric Illuminating Company and Toledo Edison Company (collectively “FirstEnergy”).

The OHA is a private, nonprofit trade association with 178 hospitals and 40 healthcare system members that have more than 700 electricity accounts statewide. Collectively, OHA members annually spend well in excess of \$150 million for electric services. A significant amount of that expenditure is for electric service provided by the FirstEnergy operating companies to the approximately 60 OHA member hospitals in FirstEnergy’s service areas. Every hospital, or virtually every hospital, in FirstEnergy’s service area is a member of OHA and all OHA member hospitals are posted at [www.ohanet.org/about\\_oha/member\\_list.asp](http://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 proceeding could have a substantial effect on the electricity costs of OHA members, including the hospitals in the service area of FirstEnergy, as well as hospital interests in power reliability, adequacy, and demand management. A significant component of hospital costs is electric, 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 very 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 organization 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 FirstEnergy 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 proceeding that is not adequately addressed by any other party. OHA's participation will enhance the effectiveness of the above proceedings, 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 determine that OHA has a real and substantial interest in these proceedings and should grant its Motion to Intervene pursuant to R.C. Section 4903.221 and OAC Rule 4901-1-11.

Respectfully submitted on behalf of  
OHIO HOSPITAL ASSOCIATION



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## 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 30<sup>th</sup> day of October 2009 *via* first class mail.



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