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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Columbus Southern)
Power Company and Ohio Power Company for)
Administration of the Significantly Excessive Earnings Test) Case No. 10-1261-EL-UNC
Under Section 4928.143(F), Revised Code, and Rule)
4901:1-35-10, Ohio Administrative Code.)

PUCO

MOTION TO INTERVENE OF THE OHIO HOSPITAL ASSOCIATION

Pursuant to Ohio Revised Code Section ("R.C.") 4903.221, Ohio Administrative Code ("OAC") Rule 4901-1-11 and the Attorney Examiner's entry dated September 21, 2010, the Ohio Hospital Association ("OHA") moves for leave to intervene in this proceeding. The Public Utilities Commission of Ohio ("Commission") should grant OHA leave to intervene because OHA has a real and substantial interest in this proceeding, and the Commission's disposition of this proceeding may impair or impede OHA's ability to protect that interest.

MEMORANDUM IN SUPPORT

On September 1, 2010 Columbus Southern Power Company and Ohio Power Company (collectively "AEP Companies") filed an application for the administration of the significantly excessive earnings test as required by R.C 4928.143(F) and Ohio Administrative OAC Rule 4901:1-35-10. The members of OHA will be affected by the Commission's determination whether the AEP Companies experienced significantly excessive earnings in 2009.

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OHA should be permitted to intervene in the above-captioned proceedings because it has real and substantial interests.

The OHA is a private, nonprofit trade association with more than 170 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 AEP Companies to the approximately 50 OHA member hospitals in AEP Companies' service areas. Every hospital, or virtually every hospital, in the AEP Companies' service area is a member of OHA and all OHA member hospitals are posted at <http://www.ohanet.org/Members>.


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 the AEP Companies, 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 this proceeding 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; the

outcome of this case will significantly impact the reasonableness of AEP's rates charged to hospitals for the foreseeable future.

As a result of the above concerns and hospital characteristics, OHA has a substantial interest in this 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 this proceeding and should grant its Motion to Intervene pursuant to R.C. 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 27th day of September 2010 *via* first class mail.



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