

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The Dayton Power and Light Company for Approval of Its Market Rate Offer.	) ) )	Case No. 12-426-EL-SSO
In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs.	) ) )	Case No. 12-427-EL-ATA
In the Matter of the Application of The Dayton Power and Light Company for Approval of Certain Accounting Authority.	) ) ) )	Case No. 12-428-EL-AAM
In the Matter of the Application of The Dayton Power and Light Company for the Waiver of Certain Commission Rules.	) ) ) )	Case No. 12-429-EL-WVR
In the Matter of the Application of The Dayton Power and Light Company to Establish Tariff Riders.	) ) )	Case No. 12-672-EL-RDR

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

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Pursuant to §4903.221 of the Ohio Revised Code and Rule 4901-1-11 of the Ohio Administrative Code, 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.

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## MEMORANDUM IN SUPPORT

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On March 30, 2012, Dayton Power & Light Company (“DP&L”) filed an application to meet its standard service offer (“SSO”) pursuant to Ohio Revised Code Section (“R.C.”) 4928.141. OHA should be permitted to intervene in the above-captioned proceeding because it has real and substantial interests.

OHA is a private nonprofit trade association established in 1915 as the first state-level hospital association in the United States and is the only Ohio trade association representing hospitals with 168 private, state and federal government hospitals and more than 18 health systems. OHA’s mission is to be a membership-driven organization that provides proactive leadership to create an environment in which Ohio hospitals are successful in serving their communities. A significant amount of that expenditure is for service provided by Dayton Power & Light Company (“DP&L”) to the approximately 21 hospitals in its service area. Every hospital, or virtually every hospital, in DP&L’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 DP&L, 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, hospital 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 DP&L 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 §4903.221 of the Ohio Revised Code and Rule 4901-1-11 of the Ohio Administrative Code.

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 11<sup>th</sup> day of April 2012 *via* electronic mail.



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Summary: Motion to Intervene electronically filed by Teresa Orahood on behalf of Ohio Hospital Association