

**BEFORE  
THE PUBLIC UTILITY COMMISSION OF OHIO**

In the Matter of the Review of the Application of	)	
Ohio Edison Company, The Cleveland Electric	)	Case No. 12-2190-EL-POR
Illuminating Company and The Toledo Edison	)	Case No. 12-2191-EL-POR
Company for Approval of Their Energy Efficiency	)	Case No. 12-2192-EL-POR
and Peak Demand Reduction Program Portfolio	)	
Plans for 2013through 2015.	)	

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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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On July 31, 2012, Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively, “FirstEnergy”) filed in the above-captioned cases an Application for approval of their respective initial three-year energy efficiency and peak demand reduction program portfolios as well as for approval of their respective initial benchmark compliance reports.

The OHA is a private, nonprofit trade association with about 167 hospitals and 19 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 61 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 <http://www.ohanet.org/Members>.

The OHA should be permitted to intervene in the above-captioned proceedings because it has real and substantial interests. 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 ability of OHA members in the service area of FirstEnergy to achieve the potential cost savings that well-designed efficiency programs may provide. A significant component of hospital costs is electric, estimated in 2008 at about \$4500 per staffed bed per annum, and such costs are necessarily passed on to patients, their families, businesses and taxpayers. 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 proceedings 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 13<sup>th</sup> day of August 2012 *via* electronic mail or first class mail.



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