

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power)	
Company to Initiate Phase 2 of Its gridSMART)	
Project and to Establish the gridSMART Phase 2)	Case No. 13-1939-EL-RDR
Rider.)	

**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 entry dated October 2, 2013, the Ohio Hospital Association (“OHA”) herewith moves for leave to intervene in the above-captioned proceeding. The OHA requests that the Public Utilities Commission of Ohio (“Commission”) grant OHA leave to intervene because OHA has a real and substantial interest in this proceeding, its participation will not cause undue delay, and the Commission’s disposition of this proceeding may impair or impede OHA’s ability to protect that interest.

MEMORANDUM IN SUPPORT

On September 13, 2013, AEP-Ohio filed an application for authority to establish a gridSMART Phase 2 rider as the mechanism to recover any gridSMART project investment beyond Phase 1. This filing was preceded by the approval of AEP-Ohio’s request to initiate Phase 2 of its gridSMART project in the August 8, 2012, Opinion and Order in Case No. 11-346-EL-SSO, et al. (“ESP Order”). In the ESP Order directed AEP Ohio to file its proposed expansion of the gridSMART project as part of a new gridSMART application to include

sufficient detail on the proposed equipment and technology for the Commission to evaluate the demonstrated success, cost-effectiveness, customer acceptance, and feasibility of the proposed technology. The Commission further directed that any gridSMART investment beyond Phase 1 that is not subject to recovery through AEP-Ohio's distribution investment rider should be recovered through a mechanism other than the current gridSMART rider, such as through a gridSMART Phase 2 rider. ESP Order at pp. 62-63.

The members of OHA located within the AEP-Ohio service territory will be affected by the Commission's determination in this matter, and 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 213 hospitals, 54 of which are AEP-Ohio customers, and 22 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—approximately \$4,500 a year for each staffed hospital bed. 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. Every hospital, or virtually every hospital, in AEP-Ohio's service area is a member of OHA and all OHA member hospitals are posted at <http://www.ohanet.org/Members>.

The OHA continues to be involved in efforts to enhance electric service reliability to its members through both its advocacy before the Commission and through informal cooperative discussions with Ohio's EDUs. The Distribution Automation Circuit Reconfiguration ("DACR") and Volt/VAR Optimization ("VVO") components of this filing are important to the OHA.

The OHA is keenly interested in insuring that the ultimate resolution of the matters in this proceeding will have a positive impact on the reliability of the electricity delivered to of OHA

members, while ensuring that rates remain reasonable. The 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 these matters 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
THE OHIO HOSPITAL ASSOCIATION



Richard L. Sites
General Counsel & Senior Director of Health Policy
OHIO HOSPITAL ASSOCIATION
155 East Broad Street, 15th Floor
Columbus, OH 43215-3620
Telephone: (614) 221-7614
Facsimile: (614) 221-4771
Email: ricks@ohanet.org

And

Thomas J. O'Brien
BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215-4291
Telephone: (614) 227-2335
Facsimile: (614) 227-2390
E-mail: tobrien@bricker.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene and Comments was served upon the parties of record listed below *via* electronic mail this 24th day of October 2013.



Thomas J. O'Brien

Matthew J. Satterwhite
Steven T. Nourse
Yazen Alami
American Electric Power Corporation
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215
mjstatterwhite@aep.com
stnourse@aep.com
yalami@aep.com

Samuel C. Randazzo
Frank P. Darr
Joseph E. Olikier
Matthew R. Pritchard
McNees Wallace & Nurick LLC
21 East State Street, 17th Floor
Columbus, OH 43215
sam@mwncmh.com
fdarr@mwncmh.com
joliker@mwncmh.com
mpritchard@mwncmh.com

Ryan P. O'Rourke
Devin Parram
Assistant Attorney Generals
Public Utilities Section
180 East Broad Street, 6th Floor
Columbus, OH 43215-3793
ryan.orourke@puc.state.oh.us
devin.parram@puc.state.oh.us

Michael J. Schuler
Assistant Consumers' Counsel
Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485
terry.etter@occ.ohio.gov
michael.schuler@occ.ohio.gov

Colleen Mooney
Ohio Partners for Affordable Energy
231 West Lima Street
Findlay, OH 45839-1793
cmooney@ohiopartners.org

Trent A. Dougherty
Ohio Environmental Council
1207 Grandview Avenue, Suite 201
Columbus, Ohio 43212-3449
TDougherty@theOEC.org

Mark A. Whitt
Andrew J. Campbell
Gregory L. Williams
Whitt Sturtevant LLP
88 East Broad Street, Suite 1590
Columbus, Ohio 43215
whitt@whitt-sturtevant.com
campbell@whitt-sturtevant.com
williams@whitt-sturtevant.com

Vincent Parisi
Matthew White
Interstate Gas Supply, Inc.
6100 Emerald Parkway
Dublin, Ohio 43016
vparisi@igsenergy.com
mwhite@igsenergy.com

John T. Finnigan
Senior Regulatory Attorney
Environmental Defense Fund
128 Winding Brook Lane
Terrace Park, Ohio 45174
jfinnigan@edf.org

Nicholas McDaniel
Environmental Law & Policy Center
1207 Grandview Avenue, Suite 201
Columbus, OH 43212
NMcDaniel@elpc.org

Jennifer L. Lause
Joseph M. Clark
Direct Energy Services, LLC
21 E. State Street, Suite 1950
Columbus, OH 43215
jennifer.lause@directenergy.com
joseph.clark@directenergy.com

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Summary: Motion to Intervene of The Ohio Hospital Association electronically filed by Teresa Orahod on behalf of Thomas O'Brien