

**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.)	

**COMMENTS OF
THE OHIO HOSPITAL ASSOCIATION**

I. INTRODUCTION

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.

By Entry dated October 2, 2013, the attorney examiner set forth a procedural schedule setting deadlines for parties to intervene and file comments. The Ohio Hospital Association timely filed its motion to intervene and now submits the following comments.

II. COMMENTS

The OHA supports AEP Ohio's efforts to improve the efficiency and reliability of its distribution system. In particular, the OHA is supportive of AEP's investment in and deployment of, Distribution Automation Circuit Reconfiguration ("DACR") and Volt/VAR Optimization ("VVO") technologies as part of its gridSMART Phase 2 program.

The hospitals that serve the communities throughout the AEP Ohio's service territory are dependent upon high-quality electric distribution service to carry out their critical mission. In recent years and for a number of reasons, this mission has expanded beyond the primary and most obvious mission of delivering healthcare services into less obvious functions, such as serving as a "last resort" source of shelter in the event of civil or weather-related emergencies.

While all acute care hospitals have self-generation capabilities, these capabilities do not always match the entire electric load of the facility, and reduced consumption is necessary in the event of an interruption in distribution service. The health, and sometimes the life, of a facility's patients can be jeopardized when service is disrupted. From the emergency rooms, surgical suites, intensive care units, labor and delivery rooms, and patient rooms to high technology diagnostic (CT scanners, MRIs, ultrasound cameras) and treatment (radiation therapy machines, gamma knives, respiratory ventilators) equipment, to the lighting, heating and cooling of the facilities that are used to care for these patients, electricity is integral to the services that our members provide. In the case of the high technology equipment used by hospitals to deliver these critical services, the *quality* of the power delivered by AEP Ohio is also of paramount importance. Voltage sags and spikes, even of brief duration, can cause interruptions in their functioning.

III. CONCLUSION

AEP Ohio, as it implements its enhancements to its distribution system, should provide priority to distribution circuits that serve its hospital customers. The OHA requests that the Commission direct AEP to review its current deployment plans with a particular view towards ensuring that those circuits serving hospitals have, to the greatest extent practicable, been prioritized in its program plans.

Respectfully submitted on behalf of
THE OHIO HOSPITAL ASSOCIATION



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Comments was served upon the parties of record listed below *via* electronic mail this 1st day of November 2013.



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Summary: Comments of The Ohio Hospital Association electronically filed by Teresa Orahood
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