

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power)	
Company to Adopt a Final Implementation Plan for)	Case No. 14-1186-EL-RDR
the Retail Stability 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, 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 July 8, 2014, Ohio Power Company (“AEP-Ohio”) filed an application for approval for continued implementation of the Retail Stability Rider (“RSR”). This filing was preceded by the approval of AEP-Ohio’s RSR in Case Nos. 10-2929-EL-UNC (“Capacity Charge”) and 11-346-EL-SSO, et al. (“ESP II”).

The members of OHA located within the AEP-Ohio service territory will be affected by the Commission's determination in these matters, and should be permitted to intervene in the above-captioned proceeding because it has real and substantial interests.

The OHA is a private, nonprofit trade association with 219 hospitals, 55 of which are AEP-Ohio customers, and 13 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 and contain costs for its members through both its advocacy before the Commission and through informal cooperative discussions with Ohio's EDUs. The OHA is keenly interested in insuring that the ultimate resolution of the matters in this proceeding will have a substantial impact on the reliability of the electricity delivered to of OHA members. 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 proceeding, 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 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 was served upon the parties of record listed below this 16th day of July 2014 *via* electronic mail.



Thomas J. O'Brien

Steven T. Nourse
Matthew J. Satterwhite
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
stnourse@aep.com
mjsatterwhite@aep.com

David Boehm
Michael Kurtz
Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
dboehm@bkllawfirm.com
mkurtz@bkllawfirm.com
jkylercohn@bkllawfirm.com

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

7/16/2014 2:03:16 PM

in

Case No(s). 14-1186-EL-RDR

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