

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Review of Ohio )	
Power Company's Distribution Investment Rider )	Case No. 14-2275-EL-UNC
Plan. )	

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

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Pursuant to Ohio Revised Code Section ("R.C.") 4903.221, Ohio Administrative Code ("OAC") Rule 4901-1-11, and the Attorney Examiner Entry dated May 12, 2015, 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 August 8, 2012, the Commission issued its opinion and order in Case No. 11-346-EL-SSO, et al. ("ESP Order"), which among other things, modified and approved Ohio Power Company's (hereinafter "AEP-Ohio") proposed Distribution Investment Rider ("DIR") for the replacement of the Company's aging infrastructure. The Commission directed AEP Ohio to work with Staff to develop the DIR plan. Finally the Commission directed that the DIR plan developed by Staff and AEP-Ohio to be reviewed annually for accounting accuracy, prudence, and compliance. On December 15, 2014, AEP-Ohio filed its DIR plan.

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 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 pursue 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 OHA is keenly interested in insuring that the ultimate resolution of the matters in this proceeding will have a substantial and positive impact on the reliability of the electricity delivered to of OHA members. Accordingly, 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 proceeding in this matter is fair to its membership.

WHEREFORE, OHA respectfully requests the Commission grant OHA's Motion to Intervene pursuant to R.C. 4903.221 and OAC Rule 4901-1-11.

Respectfully submitted on behalf of  
THE OHIO HOSPITAL ASSOCIATION



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Richard L. Sites  
Regulatory Counsel  
OHIO HOSPITAL ASSOCIATION  
155 East Broad Street, 15<sup>th</sup> Floor  
Columbus, OH 43215-3620  
Telephone: (614) 221-7614  
Facsimile: (614) 221-4771  
Email: [ricks@ohanet.org](mailto: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](mailto: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 15<sup>th</sup> day of May 2015 *via* electronic mail.



Thomas J. O'Brien

Matthew J. Satterwhite  
Steven T. Nourse  
American Electric Power Corporation  
1 Riverside Plaza, 29th Floor  
Columbus, Ohio 43215  
[mjstatterwhite@aep.com](mailto:mjstatterwhite@aep.com)  
[stnourse@aep.com](mailto:stnourse@aep.com)

Joseph P. Serio  
Assistant Consumers' Counsel  
Office of the Ohio Consumers' Counsel  
10 West Broad Street, Suite 1800  
Columbus, Ohio 43215-3485  
[joseph.serio@occ.ohio.gov](mailto:joseph.serio@occ.ohio.gov)

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