

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

|                                                                                                                            |                  |                         |
|----------------------------------------------------------------------------------------------------------------------------|------------------|-------------------------|
| In the Matter of the Application The Dayton<br>Power and Light Company to Increase its<br>Rates for Electric Distribution. | )<br>)<br>)      | Case No. 15-1830-EL-AIR |
| In the Matter of the Application of The<br>Dayton Power and Light Company for<br>Accounting Authority.                     | )<br>)<br>)      | Case No. 15-1831-EL-ATA |
| In the Matter of the Application of The<br>Dayton Power and Light Company for<br>Approval of Revised Tariffs.              | )<br>)<br>)<br>) | Case No. 15-1832-EL-AAM |

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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, the Ohio Hospital Association (“OHA”) herewith moves for leave to intervene in the above-captioned proceedings. 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 these proceedings, its participation will not cause undue delay, 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 November 30, 2015, Dayton Power & Light Company (“DP&L”) filed an application for authority to increase its rates for electric distribution service. The members of OHA located within the DP&L service territory will be affected by the Commission’s determination in these

matters, 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 220 hospitals, 21 of which are DP&L customers. These OHA-member hospitals served by DP&L consumed more than 284,000 MWh of electricity in 2015. Residents in the area served by DP&L rely on those 21 OHA-member hospitals over 2.3 million times per year for health care services on a combined in-patient and out-patient basis according to 2014 data. 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 DP&L'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 these proceedings will not have a negative impact on the reliability of the electricity delivered to OHA-member hospitals. The 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 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



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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 14<sup>th</sup> day of March 2016 *via* electronic mail.



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