

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power )  
Company for Authority to Establish a Standard )  
Service Offer Pursuant to §4928.143, Revised ) Case No. 16-1852-EL-SSO  
Code, in the Form of an Electric Security Plan. )

In the Matter of the Application of Ohio Power )  
Company for Approval of Certain Accounting ) Case No. 16-1853-EL-AAM  
Authority. )

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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”) moves for leave to intervene in these proceedings. The Public Utilities Commission of Ohio (“Commission”) should grant OHA leave to intervene because OHA has a real and substantial interest in these proceedings, and the Commission’s disposition of these proceedings may impair or impede OHA’s ability to protect that interest.

Respectfully submitted on behalf of  
THE OHIO HOSPITAL ASSOCIATION



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**MEMORANDUM IN SUPPORT**

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On December 20, 2013, Ohio Power Company (“AEP Ohio”) filed an Application in Case No. 13-2385-EL-SSO to establish its third electric security plan (“ESP III”). Also on December 20, 2013 AEP Ohio filed an Application for approval of certain accounting authority in Case No. 13-2386-EL-ATA. AEP Ohio’s ESP III application was approved as modified by the Commission on February 25, 2015.

AEP Ohio also filed an application on October 3, 2014 in Case No. 14-1693-EL-RDR, to expand its purchase power agreement (“PPA Case”), which the Commission approved the stipulation with modifications on March 31, 2016. By Entry dated September 7, 2016, the attorney examiner ordered AEP Ohio to refile its application and supporting testimony to extent the ESP III consistent with approved PPA. OHA was granted intervention on April 21, 2014 in the ESP III and on September 15, 2015 in the PPA Case.

The OHA is a private, nonprofit trade association with 220 hospitals, 55 of which are AEP Ohio customers. These OHA-member hospitals served by AEP Ohio consumed more than 700 MWh of electricity in 2015. Residents in the area served by AEP Ohio rely on those 55

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 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 not have a negative impact on the reliability of the electricity delivered to OHA-member hospitals. 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 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



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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 28<sup>th</sup> day of November 2016 *via* electronic mail.



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Summary: Motion to Intervene of The Ohio Hospital Association electronically filed by Teresa Orahoad on behalf of Matthew W. Warnock