

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy Ohio, Inc. for an Increase in Electric Distribution Rates.	)	Case No. 17-32-EL-AIR
	)	
In the Matter of Application of Duke Energy Ohio, Inc. for Tariff Approval.	)	Case No. 17-33-EL-ATA
	)	
In the Matter of the Application of Duke Energy Ohio, Inc. for Approval to Change Accounting Methods.	)	Case No. 17-34-EL-AAM
	)	

---

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

---

Pursuant to Ohio Revised Code Section (“RC”) 4903.221, and 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.

Respectfully submitted on behalf of  
THE OHIO HOSPITAL ASSOCIATION



---

Richard L. Sites  
Regulatory Counsel  
OHIO HOSPITAL ASSOCIATION  
155 East Broad Street, 3<sup>rd</sup> Floor  
Columbus, OH 43215-3620  
Telephone: (614) 221-7614  
Facsimile: (614) 221-4771  
Email: [rick.sites@ohiohospitals.org](mailto:rick.sites@ohiohospitals.org)

and

Dylan F. Borchers  
Devin D. Parram  
BRICKER & ECKLER LLP  
100 South Third Street  
Columbus, OH 43215-4291  
Telephone: (614) 227-4914; 227-8813  
Facsimile: (614) 227-2390  
E-mail: [dborchers@bricker.com](mailto:dborchers@bricker.com)  
[dparram@bricker.com](mailto:dparram@bricker.com)

---

## MEMORANDUM IN SUPPORT

---

On March 2, 2017, Duke Energy Ohio, Inc. (“Duke”) filed an application for an increase in electric distribution rates. OHA’s members are end-use customers of Duke and as such are subject to Duke’s electric distribution rates. OHA 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, 20 of which are Duke’s customers. These OHA-member hospitals served by Duke consumed more than 400 GWh of electricity in 2015. Residents in the areas served by Duke rely on OHA-member hospitals over 3.2 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 Duke’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



---

Richard L. Sites  
Regulatory Counsel  
OHIO HOSPITAL ASSOCIATION  
155 East Broad Street, 3<sup>rd</sup> Floor  
Columbus, OH 43215-3620  
Telephone: (614) 221-7614  
Facsimile: (614) 221-4771  
Email: [rick.sites@ohiohospitals.org](mailto:rick.sites@ohiohospitals.org)

and

Dylan F. Borchers  
Devin D. Parram  
BRICKER & ECKLER LLP  
100 South Third Street  
Columbus, OH 43215-4291  
Telephone: (614) 227-4914; 227-8813  
Facsimile: (614) 227-2390  
E-mail: [dborchers@bricker.com](mailto:dborchers@bricker.com)  
[dparram@bricker.com](mailto:dparram@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 in these proceedings by electronic mail this 24<sup>th</sup> day of March 2017.



---

Devin D. Parram

[amy.Spiller@duke-energy.com](mailto:amy.Spiller@duke-energy.com)  
[jeanne.kingery@duke-energy.com](mailto:jeanne.kingery@duke-energy.com)  
[elizabeth.watts@duke-energy.com](mailto:elizabeth.watts@duke-energy.com)  
[rocco.d'ascenzo@duke-energy.com](mailto:rocco.d'ascenzo@duke-energy.com)  
[steven.beeler@ohioattorneygeneral.gov](mailto:steven.beeler@ohioattorneygeneral.gov)  
[robert.eubanks@ohioattorneygeneral.gov](mailto:robert.eubanks@ohioattorneygeneral.gov)  
[ajay.kumar@occ.ohio.gov](mailto:ajay.kumar@occ.ohio.gov)  
[jodi.bair@occ.ohio.gov](mailto:jodi.bair@occ.ohio.gov)  
[christopher.healey@occ.ohio.gov](mailto:christopher.healey@occ.ohio.gov)  
[mkurtz@bkllawfirm.com](mailto:mkurtz@bkllawfirm.com)  
[kboehm@bkllawfirm.com](mailto:kboehm@bkllawfirm.com)  
[jkylercohn@bkllawfirm.com](mailto:jkylercohn@bkllawfirm.com)  
[fdarr@mwncmh.com](mailto:fdarr@mwncmh.com)  
[mpritchard@mwncmh.com](mailto:mpritchard@mwncmh.com)  
[cmooney@ohiopartners.org](mailto:cmooney@ohiopartners.org)  
[mfleisher@elpc.org](mailto:mfleisher@elpc.org)  
[joliker@igsenergy.com](mailto:joliker@igsenergy.com)  
[paul@carpenterlipps.com](mailto:paul@carpenterlipps.com)  
[eakhbari@bricker.com](mailto:eakhbari@bricker.com)

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**3/24/2017 2:27:41 PM**

**in**

**Case No(s). 17-0032-EL-AIR, 17-0033-EL-ATA, 17-0034-EL-AAM**

Summary: Motion to Intervene of The Ohio Hospital Association electronically filed by Teresa Orahoo on behalf of Elyse Akhbari