

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy)	
Ohio, Inc., for Authority to Establish a Standard)	
Service Offer Pursuant to Section 4923.143,)	Case No. 17-1263-EL-SSO
Revised Code, in the Form of an Electric)	
Security Plan, Accounting Modifications and)	
Tariffs for Generation Service.)	

In the Matter of Application of Duke Energy)	
Ohio, Inc., for Authority to Amend its Certified)	Case No. 17-1264-EL-ATA
Supplier Tariff, P.U.C.O. No. 20.)	

In the Matter of the Application of Duke Energy)	
Ohio, Inc., for Authority to Defer Vegetation)	Case No. 17-1265-EL-AAM
Management Costs.)	

MOTION TO INTERVENE OF THE OHIO HOSPITAL ASSOCIATION

Pursuant to Ohio Revised Code Section (“R.C.”) 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 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.

Respectfully submitted on behalf of
THE OHIO HOSPITAL ASSOCIATION



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MEMORANDUM IN SUPPORT

On June 1, 2017, Duke Energy Ohio, Inc. (“Duke”) filed its fourth application to establish a standard service offer in the form of an electric security plan to be effective from June 1, 2018 through May 31, 2024. 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 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 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.

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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 12th day of July 2017 *via* electronic mail.



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Case No(s). 17-1263-EL-SSO, 17-1264-EL-ATA, 17-1265-EL-AAM

Summary: Motion to Intervene of the Ohio Hospital Association electronically filed by Teresa Orahoo on behalf of Dylan F. Borchers