

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Filing by Ohio Edison)
Company, The Cleveland Electric Illuminating)
Company and The Toledo Edison Company) Case No. 17-2436-EL-UNC
Application for Approval of a Distribution)
Platform Modernization Rider.)

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”) 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.

Respectfully submitted on behalf of
THE OHIO HOSPITAL ASSOCIATION



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MEMORANDUM IN SUPPORT

On December 1, 2017, the Ohio Edison Company, The Cleveland Electric Illuminating Company and Toledo Edison Company (collectively “FirstEnergy”) filed an application for approval of its Distribution Platform Modernization Plan (“DPM Plan”). In the DPM Plan, FirstEnergy seeks approval to expend approximately \$450 million to modernize the electric distribution platform of its three operating companies, and recover those costs over a five (5) year period from the companies’ customers.

The members of OHA located within the FirstEnergy 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 219 hospitals and 55 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 FirstEnergy’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 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 impact on the reliability of the electricity delivered to of OHA members. 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 proceedings in these matters are fair to its membership.

Accordingly, OHA respectfully requests the Commission to 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 16th day of February 2018 *via* electronic mail.



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Summary: Motion to Intervene of the Ohio Hospital Association electronically filed by Teresa Orahood on behalf of Devin D. Parram