BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In The Matter of the Long-Term Forecast)	
Report of Ohio Power Company and Related)	Case No. 18-501-EL-FOR
Matters.)	

MOTION TO INTERVENE OF THE OHIO HOSPITAL ASSOCIATION

Pursuant to Ohio Revised Code ("R.C.") Section 4903.221 and Ohio Administrative Code Rule ("OAC") Rule 4901-1-11, the Ohio Hospital Association ("OHA") moves to intervene in this proceeding. The Public Utilities Commission of Ohio ("Commission") should grant OHA's motion 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 October 5, 2018, OHA filed a Motion to Intervene in Ohio Power Company's ("AEP Ohio") application for approval of its proposal to include the costs associated with two solar energy projects in its Renewable Generation Rider, and to amend its tariff ("Tariff Cases"). By Entry dated October 22, 2018, the attorney examiner granted AEP Ohio's motion to consolidate its Long Term Forecast Report ("LTFR") with the Tariff Cases, and set forth October 29, 2018 as the deadline for motions to intervene.

OHA is a nonprofit trade association with over 200 hospitals, 55 of which are AEP Ohio customers. These OHA-member hospitals served by AEP Ohio consume a significant amount of electricity. Residents in the area served by AEP Ohio rely on those 55 OHA-member hospitals over well over one million times per year for health care services on a combined in-patient and out-patient basis. 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.

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. OHA is keenly interested in insuring that the

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ultimate resolution of the matters in this proceeding will not have a significantly negative impact on the cost or reliability of the electricity delivered to OHA-member hospitals. 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 that the Commission grant its Motion to Intervene in the LTFR and the Tariff Cases.

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 in this proceeding by electronic mail this <u>26th</u> day of October 2018.

Devin D. Parram

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