

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The)	
Dayton Power and Light Company for)	
Extension of Its Distribution Modernization)	Case No. 19-162-EL-RDR
Rider.)	

MOTION TO INTERVENE OF THE OHIO HOSPITAL ASSOCIATION

Pursuant to Ohio Revised Code Section (“R.C.”) 4903.221, Ohio Administrative Code (“OAC”) Rule 4901-1-11, the Ohio Hospital Association (“OHA”) herewith moves for leave to intervene in the above-captioned proceeding. 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 January 22, 2019, Dayton Power and Light Company (“DP&L”) filed an application for authority to extend its Distribution Modernization Rider (“DMR-E”) for two years and to set it at \$199 million which could ultimately affect the members of OHA located within the DP&L service territory. Thus, OHA should be permitted to intervene in the above-captioned proceeding because it has real and substantial interests.

OHA is a private, nonprofit trade association with approximately 246 hospitals, a number of which are DP&L customers. 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 DP&L’s service area is a member of OHA, and all OHA member hospitals are posted at <https://www.ohiohospitals.org/About-OHA/Ohio-Hospitals/Member-Hospitals>.

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 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. 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 proceeding 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.

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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 22nd day of March 2019 *via* electronic mail.



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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

3/22/2019 1:51:11 PM

in

Case No(s). 19-0162-EL-RDR

Summary: Motion of The Ohio Hospital Association and Memorandum in Support
electronically filed by Teresa Orahod on behalf of Devin D. Parram